

<p style="text-align: center;">1</p> <p>1 UNITED STATES DISTRICT COURT</p> <p>2 WESTERN DISTRICT OF WISCONSIN</p> <p>3 -----</p> <p>4 Kevin J. Grant and Dayna L. Grant,</p> <p>5 Plaintiffs,</p> <p>6 vs. File No. 3:21-cv-00055-wmc</p> <p>7 State Farm Fire</p> <p>8 And Casualty Company,</p> <p>9 Defendant.</p> <p>10 -----</p> <p>11 (The following is the DEPOSITION OF</p> <p>12 KEVIN GRANT, taken pursuant to Notice of</p> <p>13 Taking Deposition, and taken before Sandra</p> <p>14 Fellows, a Notary Public in and for the</p> <p>15 county of Ramsey, state of Minnesota, at 1666</p> <p>16 Princeton Crossing, in the city of Eau</p> <p>17 Claire, state of Wisconsin, commencing at</p> <p>18 approximately 9:00 a.m., October 13, 2021.)</p> <p>19</p> <p>20</p> <p>21 AFFILIATED COURT REPORTERS</p> <p>22 6880 RIVER ROAD</p> <p>23 INVER GROVE HEIGHTS, MINNESOTA 55076</p> <p>24 (612) 338-4348</p> <p>25</p>	<p style="text-align: center;">3</p> <p>1 I N D E X</p> <p>2 EXAMINATION: PAGE</p> <p>3 Ms. Weber 5,159</p> <p>4 Mr. Anderson 157</p> <p>5</p> <p>6 EXHIBITS PAGE</p> <p>7 1 Grant EUO 8</p> <p>8 2 Appraisal Report 101</p> <p>9 3 Renters Rate Quote 105</p> <p>10 4 Insurance Application WI 106</p> <p>11 5 State Farm Policy 113</p> <p>12 6 Declarations 114</p> <p>13 7 Renewal Declarations 119</p> <p>14 8 Renewal Declarations 122</p> <p>15 9 Grant Statement 132</p> <p>16 10 State Farm Payment 134</p> <p>17 11 State Farm Letter 10-2-20 134</p> <p>18 12 State Farm Payment 135</p> <p>19 13 State Farm Letter 11-5-20 136</p> <p>20 14 State Farm Payment 136</p> <p>21 15 State Farm Letter 10-8-20 137</p> <p>22 16 State Farm Payment 137</p> <p>23 17 State Farm Letter 5-29-19 138</p> <p>24 18 State Farm Letter 11-29-19 139</p> <p>25 19 State Farm Letter 2-13-20 ?</p>
<p style="text-align: center;">2</p> <p>1 APPEARANCES:</p> <p>2 ON BEHALF OF THE PLAINTIFFS:</p> <p>3 MICHAEL J. ANDERSON</p> <p>4 HAYLEY HETHERINGTON</p> <p>5 MJA Law LLC</p> <p>6 2886 South Syene Road</p> <p>7 Fitchburg, Wisconsin 53711</p> <p>8 ON BEHALF OF THE DEFENDANT:</p> <p>9 EMILY R. WEBER</p> <p>10 HAWS-KM, P.A.</p> <p>11 30 East Seventh Street</p> <p>12 Suite 3200</p> <p>13 St. Paul, Minnesota 55101</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: center;">4</p> <p>1 20 State Farm Sworn Statement 141</p> <p>2 21 State Farm Letter 1-28-19 142</p> <p>3 22 State Farm Letter 3-7-19 142</p> <p>4 23 State Farm Letter 5-28-19 143</p> <p>5 24 Kennedy Letter 6-18-20 143</p> <p>6 25 State Farm Letter 8-26-20 144</p> <p>7 26 State Farm Letter 9-8-20 144</p> <p>8 27 State Farm Letter 9-14-20 145</p> <p>9 28 Answers to Interrogatories 148</p> <p>10 29 Criminal Complaint 152</p> <p>11 (Original transcript to Ms. Weber.)</p> <p>12 * * *</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">5</p> <p>1 PROCEEDINGS</p> <p>2 (Witness Sworn.)</p> <p>3 KEVIN GRANT,</p> <p>4 called as a witness, being first duly sworn,</p> <p>5 was examined and testified as follows:</p> <p>6 EXAMINATION</p> <p>7 BY MS. WEBER:</p> <p>8 Q. Mr. Grant, my name is Emily Weber with State</p> <p>9 Farm in this action. Can you go ahead and</p> <p>08:59:38 10 state your full name for the record?</p> <p>11 A. Kevin Joseph Grant.</p> <p>12 Q. And what's your date of birth?</p> <p>13 A. [REDACTED]</p> <p>14 Q. Have you ever been deposed before?</p> <p>08:59:50 15 A. Yes.</p> <p>16 Q. And I am going to run through just some quick</p> <p>17 reminder instructions for the deposition. We</p> <p>18 do have the court reporter here taking down</p> <p>19 everything that we say so I do ask that you</p> <p>09:00:03 20 have audible answers. Head nods, head shakes</p> <p>21 don't appear on the record well. Also, if we</p> <p>22 could avoid uh-huh or uh-uh, those look very</p> <p>23 similar, so yeses or noes would be</p> <p>24 appreciated. Also, if we could try not to</p> <p>09:00:20 25 talk over each other. I know</p>	<p style="text-align: right;">7</p> <p>1 Q. Do you have any medical conditions that would</p> <p>2 affect your ability to testify truthfully or</p> <p>3 have any memory issues?</p> <p>4 A. No.</p> <p>09:01:36 5 Q. So I'm going to jump back to when you were</p> <p>6 deposed before. Why were you deposed?</p> <p>7 A. The deposition was for State Farm through the</p> <p>8 Borgelt attorney firm.</p> <p>9 Q. Okay. So are you referring to your</p> <p>09:01:57 10 Examination Under Oath that was for this</p> <p>11 claim?</p> <p>12 A. Yes, I am.</p> <p>13 Q. Okay. Have you been deposed for any other</p> <p>14 reason other than that?</p> <p>09:02:06 15 A. No.</p> <p>16 Q. Did you review anything to prepare for this</p> <p>17 deposition, any documents or anything like</p> <p>18 that?</p> <p>19 A. Yes.</p> <p>09:02:18 20 Q. What did you review?</p> <p>21 A. The Examination Under Oath transcripts.</p> <p>22 Q. Did you review anything else?</p> <p>23 A. No.</p> <p>24 Q. Have you talked to anybody besides your</p> <p>09:02:32 25 attorney regarding this deposition?</p>
<p style="text-align: right;">6</p> <p>1 conversationally we tend to do those things,</p> <p>2 but for the record, for the court reporter,</p> <p>3 let's try to let each one answer a question</p> <p>4 and answer before we start our own.</p> <p>09:00:33 5 If I ask you any question and you</p> <p>6 don't understand it, please feel free at any</p> <p>7 time to ask me to clarify. If I ask you a</p> <p>8 question and you answer, I'm going to assume</p> <p>9 that you understood the question. So I will</p> <p>09:00:47 10 probably ask a bad question at some point in</p> <p>11 time, just let me know so I can clarify.</p> <p>12 We'll take regular breaks for the</p> <p>13 court reporter, for ourselves. If you need a</p> <p>14 break, please let me know. I'd just ask that</p> <p>09:01:02 15 if there's a question pending, you answer</p> <p>16 that question prior to the break?</p> <p>17 Your attorneys may object at any</p> <p>18 point in time. Unless they instruct you not</p> <p>19 to answer, please go ahead and answer</p> <p>09:01:16 20 whatever question I ask despite the</p> <p>21 objection.</p> <p>22 Are you on any medications today</p> <p>23 that would affect your ability to testify</p> <p>24 truthfully or have any memory issues?</p> <p>09:01:26 25 A. No.</p>	<p style="text-align: right;">8</p> <p>1 A. Yes.</p> <p>2 Q. Who have you talked to?</p> <p>3 A. My wife.</p> <p>4 Q. And did you meet with your attorney regarding</p> <p>09:02:44 5 this deposition? I don't want to know</p> <p>6 details, but did you meet with your attorney</p> <p>7 regarding this deposition?</p> <p>8 A. Yes.</p> <p>9 (Deposition Exhibit Number 1 was</p> <p>10 marked for identification.)</p> <p>11 BY MS. WEBER:</p> <p>12 Q. Okay. Mr. Grant, I'm showing you a document</p> <p>13 marked Exhibit Number 1. Do you recognize</p> <p>14 this document?</p> <p>09:03:31 15 A. Yes.</p> <p>16 Q. Can you flip to the back two pages for me?</p> <p>17 Actually, I believe it's the back</p> <p>18 page we need to look at. Is that your</p> <p>19 signature on the bottom of the last page?</p> <p>09:04:02 20 A. Yes.</p> <p>21 Q. And this Examination Under Oath was given on</p> <p>22 March 18th, 2020; is that correct? Should be</p> <p>23 on the front page.</p> <p>24 A. That's what's written on the front page.</p> <p>09:04:19 25 Q. You mentioned that you read this prior to</p>

<p style="text-align: right;">9</p> <p>1 your deposition today, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Is there anything you'd like to change?</p> <p>4 A. No.</p> <p>09:04:42 5 MR. ANDERSON: I just have a</p> <p>6 clarifying question. Is there anything</p> <p>7 regarding his response or is there anything</p> <p>8 he would like to change as far as --</p> <p>9 BY MS. WEBER:</p> <p>09:04:51 10 Q. In the EUO. Do you want to change any</p> <p>11 answers or anything in the Examination Under</p> <p>12 Oath?</p> <p>13 A. No.</p> <p>14 Q. So everything you've said in that Examination</p> <p>09:05:03 15 Under Oath is still true and correct?</p> <p>16 A. Yes.</p> <p>17 Q. Have you been involved in any litigation</p> <p>18 before?</p> <p>19 A. Yes.</p> <p>09:05:11 20 Q. What litigation?</p> <p>21 A. We've been in lawsuits.</p> <p>22 Q. What lawsuits?</p> <p>23 A. I was plaintiff in an action against two of</p> <p>24 my business partners.</p> <p>09:05:28 25 Q. Who were those business partners?</p>	<p style="text-align: right;">11</p> <p>1 Q. Did you start it with those two business</p> <p>2 partners?</p> <p>3 A. I was actually an employee for a few years.</p> <p>4 Q. Did you start as an employee in 1986?</p> <p>09:07:27 5 A. Yes.</p> <p>6 Q. And at some point in time you became the</p> <p>7 owner of this company?</p> <p>8 A. Yes.</p> <p>9 Q. When did you become the owner of the company?</p> <p>09:07:34 10 A. I believe it would have been 1994.</p> <p>11 Q. When you became the owner, did you have any</p> <p>12 business partners at that time?</p> <p>13 A. Other than the two I'm talking about?</p> <p>14 Q. Okay. So Mark Tyler and James Hauschild</p> <p>09:07:56 15 bought the company with you in 1994?</p> <p>16 A. We were -- to clarify, they were the original</p> <p>17 owners. They allowed me to buy an equal</p> <p>18 share.</p> <p>19 Q. What did that company do?</p> <p>09:08:16 20 A. They were a fabricator of heavy metal</p> <p>21 components for other end product</p> <p>22 manufacturers.</p> <p>23 Q. Okay. What were your duties as a partial</p> <p>24 owner at OEM Fabricators?</p> <p>09:08:40 25 A. I was mainly in charge of sales.</p>
<p style="text-align: right;">10</p> <p>1 A. Mark Tyler and James Hauschild.</p> <p>2 Q. And what was that litigation about?</p> <p>3 A. That was the dispute over the company value.</p> <p>4 Q. Had you sold the company or why were you</p> <p>09:06:01 5 disputing the value of the company?</p> <p>6 A. A buy-sell agreement was put into effect.</p> <p>7 Q. So you sued Mark Tyler and James Hauschild,</p> <p>8 what was your cause of action?</p> <p>9 A. The value of the company just prior to that</p> <p>09:06:26 10 had been appraised at a much higher value,</p> <p>11 but when the buy-sell agreement was exercised</p> <p>12 they had a different value on it.</p> <p>13 Q. So did you sue them for breach of contract?</p> <p>14 A. I don't know if it would have been a breach</p> <p>09:06:45 15 of contract issue.</p> <p>16 Q. Okay.</p> <p>17 MR. ANDERSON: I want this for a</p> <p>18 clear record. Can you specify what company</p> <p>19 we're talking about? I believe my client has</p> <p>09:06:54 20 a number of companies over the years.</p> <p>21 BY MS. WEBER:</p> <p>22 Q. Absolutely. What company was this?</p> <p>23 A. That would be OEM Fabricators, Incorporated.</p> <p>24 Q. When did you start this company?</p> <p>09:07:08 25 A. 1986.</p>	<p style="text-align: right;">12</p> <p>1 Q. What did you do in charge of sales?</p> <p>2 A. I identified companies all across the state</p> <p>3 as well as surrounding states that could use</p> <p>4 our services in their products.</p> <p>09:09:13 5 Q. What was the business organization of OEM</p> <p>6 Fabricators? Was that a corporation, an LLC?</p> <p>7 A. It was a corporation.</p> <p>8 Q. Corporation. Okay. In 1986, when you were</p> <p>9 an employee, to 1994, when you became a</p> <p>09:09:35 10 partial owner, what were your job duties in</p> <p>11 that amount of time?</p> <p>12 A. My job duties were varied, because in order</p> <p>13 to do a proper sales job, I had to learn a</p> <p>14 lot of the components of the actual business</p> <p>09:09:51 15 itself. So my duties were in actual</p> <p>16 production in various areas of fabrication.</p> <p>17 Q. Can you explain to us what your duties in</p> <p>18 production were?</p> <p>19 A. I ran a flame cutter. I ran a press brake.</p> <p>09:10:17 20 I ran some machining equipment. I did some</p> <p>21 welding.</p> <p>22 Q. And was there a time when you switched over</p> <p>23 to primarily sales?</p> <p>24 A. Yes. This would have been over a period of</p> <p>09:10:41 25 time where I transitioned from the shop to an</p>

<p style="text-align: right;">13</p> <p>1 office position in sales.</p> <p>2 Q. And was OEM Fabricators registered with the</p> <p>3 state of Wisconsin as a corporation?</p> <p>4 A. Yes.</p> <p>09:11:05 5 Q. Did you mention what percentage of the</p> <p>6 business you owned?</p> <p>7 A. 33 and 1/3 percent.</p> <p>8 Q. So each you Mark and Jacob (sic), 1/3 of the</p> <p>9 company?</p> <p>09:11:18 10 A. Yes.</p> <p>11 Q. Where was OEM Fabricators facility located?</p> <p>12 A. In Woodville, Wisconsin.</p> <p>13 Q. Did they have land or building there?</p> <p>14 A. Yes.</p> <p>09:11:39 15 Q. Both land and a building?</p> <p>16 A. Yes.</p> <p>17 Q. Do you know how much land they had?</p> <p>18 A. I would say approximately five acres.</p> <p>19 Q. And how large was the building?</p> <p>09:12:00 20 A. The building started out as a small facility</p> <p>21 and then over several additions it grew into</p> <p>22 a large facility.</p> <p>23 Q. About how large was it when you started in</p> <p>24 1986?</p> <p>09:12:21 25 A. In the original building that was leased, we</p>	<p style="text-align: right;">15</p> <p>1 Q. Did you have any hand in purchasing the</p> <p>2 insurance for this company?</p> <p>3 A. No.</p> <p>4 Q. Do you know of any claims ever made under the</p> <p>09:13:55 5 insurance of that company?</p> <p>6 A. Not that I am aware of.</p> <p>7 Q. Okay. We're going to jump back to prior</p> <p>8 litigation. Besides the action that you</p> <p>9 brought against Mark Tyler and Jacob</p> <p>09:14:35 10 Hauschild.</p> <p>11 Have you been involved in any other</p> <p>12 litigation?</p> <p>13 A. Really, no more than small claims.</p> <p>14 Q. What small claims actions have you been</p> <p>09:14:46 15 involved in?</p> <p>16 A. I've been involved in both defendant and</p> <p>17 plaintiff in several years in different small</p> <p>18 claims.</p> <p>19 Q. What small claims have you brought as a</p> <p>09:15:05 20 plaintiff?</p> <p>21 A. I brought an action against a lessee of my</p> <p>22 business for non-payment of lease.</p> <p>23 Q. And who what that?</p> <p>24 A. Kelly Holm.</p> <p>09:15:22 25 Q. When did you bring that action?</p>
<p style="text-align: right;">14</p> <p>1 started in about 1200 square feet.</p> <p>2 Q. And when you left or sold your portion of the</p> <p>3 company, how large was it then?</p> <p>4 A. I would say approximately 250,000 square</p> <p>09:12:43 5 feet.</p> <p>6 Q. Quite the change?</p> <p>7 A. Yes. I'm sorry. Sorry. Back up. I got too</p> <p>8 many zeros in there. We had three additions</p> <p>9 of 10,000 -- 25,000 square feet.</p> <p>09:13:02 10 MR. ANDERSON: Not 250,000?</p> <p>11 THE WITNESS: No.</p> <p>12 MR. ANDERSON: That's a substantial</p> <p>13 zero.</p> <p>14 THE WITNESS: It's a big zero, yes.</p> <p>09:13:09 15 BY MS. WEBER:</p> <p>16 Q. And when did you -- what year did you sell</p> <p>17 your portion of the business?</p> <p>18 A. 2004.</p> <p>19 Q. You sold that to your other two partners,</p> <p>09:13:28 20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. Was this business insured?</p> <p>23 A. Yes.</p> <p>24 Q. Do you know who it was insured through?</p> <p>09:13:39 25 A. No.</p>	<p style="text-align: right;">16</p> <p>1 A. That action would have been started in 2014.</p> <p>2 Q. And how did that action resolve?</p> <p>3 A. That was dismissed by the courts.</p> <p>4 Q. Was the action against Kelly Holm brought in</p> <p>09:15:50 5 Wisconsin?</p> <p>6 A. Yes.</p> <p>7 Q. What county?</p> <p>8 A. St. Croix County.</p> <p>9 Q. You mentioned this action was for non-payment</p> <p>09:16:11 10 of a lease, can you go into a little more</p> <p>11 detail on that?</p> <p>12 A. She was the lessee of the Cubby Hole business</p> <p>13 that I had got up and running.</p> <p>14 Q. When did she lease the Cubby Hole?</p> <p>09:16:38 15 A. In 2012.</p> <p>16 Q. Do you know what month in 2012 the lease</p> <p>17 started?</p> <p>18 A. I believe it coincided with the liquor</p> <p>19 license, so it would have been July 1st.</p> <p>09:16:53 20 Q. And how long did you that lease run?</p> <p>21 A. For one year.</p> <p>22 MR. ANDERSON: Do you know that for</p> <p>23 a fact or are you guessing the 7-1.</p> <p>24 THE WITNESS: It's basically an</p> <p>09:17:16 25 assumption.</p>

<p style="text-align: right;">17</p> <p>1 BY MS. WEBER:</p> <p>2 Q. When did Ms. Holm stop leasing the Cubby</p> <p>3 Hole?</p> <p>4 A. She stopped leasing in the end of May 2013.</p> <p>09:17:41 5 Q. So you sued her for non-payment of the lease.</p> <p>6 What months has she not paid that lease?</p> <p>7 A. It was basically a cumulative effect of</p> <p>8 several months. So at some point during her</p> <p>9 lease she was unable to make those payments.</p> <p>09:18:21 10 She had made partial payments in some months.</p> <p>11 Q. How much money did you bring that action</p> <p>12 against Kelly Holm for?</p> <p>13 A. I believe it was the limit of the small</p> <p>14 claims at that time, which was \$10,000.</p> <p>09:18:39 15 Q. And when we refer to the Cubby Hole, we are</p> <p>16 referring to the building at 105 River Street</p> <p>17 in Woodville Wisconsin?</p> <p>18 MR. ANDERSON: Object to the form</p> <p>19 of the question. I don't believe the Cubby</p> <p>09:19:09 20 Hole encompasses the entire building.</p> <p>21 BY MS. WEBER:</p> <p>22 Q. When we refer to the Cubby Hole, we are</p> <p>23 referring to a portion of the building</p> <p>24 located at 105 River Street, Woodville,</p> <p>09:19:20 25 Wisconsin?</p>	<p style="text-align: right;">19</p> <p>1 A. Arthur Chapman.</p> <p>2 Q. Did you sue Chuck Harris individually -- I'm</p> <p>3 sorry, I had this backwards.</p> <p>4 Did Chuck Harris individually sue</p> <p>09:20:58 5 you or did Arthur Chapman the firm sue you?</p> <p>6 A. I believe that Arthur Chapman was the</p> <p>7 litigant.</p> <p>8 Q. And why had they brought this action against</p> <p>9 you?</p> <p>09:21:21 10 A. I had paid the firm a \$10,000 retainer and</p> <p>11 they had -- after the action was dismissed,</p> <p>12 had charged me an additional \$6,000. And I</p> <p>13 told them that based on his performance, he</p> <p>14 wasn't getting it.</p> <p>09:21:45 15 Q. And how did this action resolve?</p> <p>16 A. There was a judgement entered against me.</p> <p>17 Q. Has that judgment been paid?</p> <p>18 A. Yes.</p> <p>19 Q. Have you been involved in any other</p> <p>09:22:18 20 litigation?</p> <p>21 MR. ANDERSON: Could I just object</p> <p>22 to form. Can you define litigation, please?</p> <p>23 That's a crazy question.</p> <p>24 BY MS. WEBER:</p> <p>09:22:42 25 Q. Have you been sued by anybody in civil court</p>
<p style="text-align: right;">18</p> <p>1 A. Yes.</p> <p>2 Q. And the entire building located at 105 River</p> <p>3 Street, Woodville, Wisconsin, is the building</p> <p>4 that is the subject of the insurance claim we</p> <p>09:19:35 5 are here in this litigation for, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Have you been involved in any other</p> <p>8 litigation besides the two that we've talked</p> <p>9 about, including the small claim with Ms.</p> <p>09:19:56 10 Holm?</p> <p>11 A. Yes.</p> <p>12 Q. What other litigation have you been involved</p> <p>13 in?</p> <p>14 A. I was the defendant in a small claims action.</p> <p>09:20:06 15 Q. And what was that action?</p> <p>16 A. That was an attorney who I had hired to</p> <p>17 represent me in the action against Mark Tyler</p> <p>18 and James Hauschild.</p> <p>19 Q. And who were the attorneys that you had</p> <p>09:20:28 20 hired?</p> <p>21 A. The attorney was Chuck Harris.</p> <p>22 Q. Was Chuck Harris with a firm when you sued</p> <p>23 him?</p> <p>24 A. Yes.</p> <p>09:20:40 25 Q. What firm was he with?</p>	<p style="text-align: right;">20</p> <p>1 or small claims court or have you sued</p> <p>2 anybody in civil court or small claims court,</p> <p>3 which I will hereafter refer to as</p> <p>4 litigation.</p> <p>09:23:02 5 MR. ANDERSON: Thank you.</p> <p>6 THE WITNESS: I believe I have.</p> <p>7 But I'm trying to check my memory, nothing is</p> <p>8 really coming to the forefront.</p> <p>9 BY MS. WEBER:</p> <p>09:23:18 10 Q. Have you been involved in a civil action with</p> <p>11 Dale Amundson?</p> <p>12 A. Yes.</p> <p>13 Q. Can you tell me about that action?</p> <p>14 A. Dale Amundson was a contractor who built my</p> <p>09:23:35 15 home in 2003.</p> <p>16 Q. And when you say your home in 2003, what was</p> <p>17 the address of that location?</p> <p>18 A. The home was at 1273 250th Street, Glenwood</p> <p>19 City, Wisconsin.</p> <p>09:24:05 20 Q. Is that not your current address?</p> <p>21 A. It is not.</p> <p>22 Q. What is your current address?</p> <p>23 A. 2648 State Road 64, Emerald, Wisconsin 54013.</p> <p>24 Q. Jumping back to litigation with Dale</p> <p>25 Amundson.</p>

<p style="text-align: right;">21</p> <p>1 Were you the plaintiff or defendant</p> <p>2 in that action?</p> <p>3 A. Defendant.</p> <p>4 Q. And what was Mr. Amundson suing you for?</p> <p>09:24:46 5 A. For non-payment of a final payment.</p> <p>6 Q. And how did that action resolve?</p> <p>7 A. The court awarded me several thousand dollars</p> <p>8 and I didn't have to pay him anything.</p> <p>9 Q. Was that a small claim action?</p> <p>09:25:13 10 A. No.</p> <p>11 Q. What year was that?</p> <p>12 A. To the best of my recollection, in the 2009</p> <p>13 range.</p> <p>14 Q. Jumping back a little bit. When was the</p> <p>09:25:55 15 action by Arthur Chapman or Chuck Harris</p> <p>16 commenced against you, about what year?</p> <p>17 A. About 2012.</p> <p>18 Q. Have you ever been sued by Liberty Mutual?</p> <p>19 A. Can I ask you a question?</p> <p>09:26:41 20 Q. Sure.</p> <p>21 A. Liberty Mutual doesn't really ring a bell,</p> <p>22 but I know there's a reason for your</p> <p>23 question, so could you give me a little bit</p> <p>24 more information?</p> <p>09:26:54 25 Q. Did Liberty Mutual or an insurance company</p>	<p style="text-align: right;">23</p> <p>1 Q. What was that action about?</p> <p>2 A. That was for a considerable sum of money that</p> <p>3 they claim I owed them because of fraudulent</p> <p>4 charges on my credit card.</p> <p>09:28:34 5 Q. Has that action resolved?</p> <p>6 A. That action was resolved at one time, but it</p> <p>7 has been reopened as a trial by American</p> <p>8 Express.</p> <p>9 Q. So it is currently pending?</p> <p>09:28:47 10 A. It's pending.</p> <p>11 Q. Have you ever been sued by Brooks Ketchum?</p> <p>12 A. Yes.</p> <p>13 Q. And when about was that action?</p> <p>14 A. 2010.</p> <p>09:29:15 15 Q. Was that in the state of Wisconsin?</p> <p>16 A. Yes.</p> <p>17 Q. What county?</p> <p>18 A. St. Croix.</p> <p>19 Q. What action was that about?</p> <p>09:29:24 20 A. He had done a bunch of metal work for me on a</p> <p>21 houseboat hull.</p> <p>22 Q. Were you the defendant in that action?</p> <p>23 A. Yes.</p> <p>24 Q. Why was Mr. Ketchum suing you?</p> <p>09:29:42 25 (Reporter Interruption.)</p>
<p style="text-align: right;">22</p> <p>1 generally bring an action against you and</p> <p>2 multiple other defendants, these defendants</p> <p>3 could have included your wife, your insurance</p> <p>4 company, possibly another person or entity.</p> <p>09:27:22 5 A. With that information, it doesn't ring a</p> <p>6 bell.</p> <p>7 MR. ANDERSON: Is there a document</p> <p>8 that you have that could refresh his</p> <p>9 recollection?</p> <p>09:27:30 10 MS. WEBER: No, there's not.</p> <p>11 That's okay.</p> <p>12 MR. ANDERSON: Okay.</p> <p>13 BY MS. WEBER:</p> <p>14 Q. Have you ever been sued by American Express</p> <p>09:27:43 15 National Bank?</p> <p>16 A. Yes.</p> <p>17 Q. And when was that action?</p> <p>18 A. That action was taken within the last year.</p> <p>19 Q. Where was that action venued? Was that in</p> <p>09:28:01 20 the state of Wisconsin?</p> <p>21 A. Yes.</p> <p>22 Q. What county?</p> <p>23 A. St. Croix.</p> <p>24 Q. Were you the defendant in that action?</p> <p>09:28:17 25 A. Yes.</p>	<p style="text-align: right;">24</p> <p>1 MR. ANDERSON: Objection. You're</p> <p>2 asking the client to get into the head of Mr.</p> <p>3 Ketchum. I don't know -- you can ask him why</p> <p>4 you think, but I don't think you can ask him</p> <p>09:29:59 5 why did he.</p> <p>6 BY MS. WEBER:</p> <p>7 Q. In Mr. Ketchum's complaint against you, what</p> <p>8 was he alleging?</p> <p>9 A. He alleged that I owed him additional monies</p> <p>09:30:11 10 for the work that he had done.</p> <p>11 Q. And how did that action resolve?</p> <p>12 A. I paid him the additional monies that he</p> <p>13 requested.</p> <p>14 Q. Have you ever been sued by Janelle Tim?</p> <p>09:30:41 15 A. Yes.</p> <p>16 Q. And when about was that brought?</p> <p>17 A. That would have been in the 2009 range.</p> <p>18 Q. Was that in the state of Wisconsin?</p> <p>19 A. Yes.</p> <p>09:31:04 20 Q. And what county?</p> <p>21 A. St. Croix.</p> <p>22 Q. Were you the defendant in that action?</p> <p>23 A. Yes.</p> <p>24 Q. And what was Janelle -- what were Janelle</p> <p>09:31:15 25 Tim's allegations against you?</p>

<p style="text-align: right;">25</p> <p>1 A. Her husband had done some custom cabinet work</p> <p>2 for me and she alleged that I owed her</p> <p>3 additional monies.</p> <p>4 Q. How did that action resolve?</p> <p>09:31:30 5 A. I paid her the additional monies.</p> <p>6 Q. Is there any other litigation we have not</p> <p>7 talked about today that you have been</p> <p>8 involved in?</p> <p>9 A. Not that I am aware of.</p> <p>09:31:47 10 Q. Have you ever been convicted of a felony?</p> <p>11 A. No.</p> <p>12 Q. Have you ever been convicted of a misdemeanor</p> <p>13 involving dishonesty such as fraud or</p> <p>14 perjury?</p> <p>09:32:06 15 A. No.</p> <p>16 Q. Have you ever been convicted of any other</p> <p>17 misdemeanor?</p> <p>18 THE WITNESS: Can I consult?</p> <p>19 MS. WEBER: Yes.</p> <p>09:33:14 20 (Attorney-Client discussion held</p> <p>21 off the record.)</p> <p>22 THE WITNESS: Could you repeat the</p> <p>23 question, please?</p> <p>24 BY MS. WEBER:</p> <p>09:34:04 25 Q. And have you ever been convicted of any</p>	<p style="text-align: right;">27</p> <p>1 THE WITNESS: On the advice of</p> <p>2 counsel, I elect to assert my Fifth Amendment</p> <p>3 privilege.</p> <p>4 BY MS. WEBER:</p> <p>09:35:55 5 Q. Have you ever been charged by the state of</p> <p>6 Wisconsin with failure to check traps and</p> <p>7 remove animals?</p> <p>8 A. Yes.</p> <p>9 Q. Roughly, when was that?</p> <p>09:36:07 10 A. Two years ago.</p> <p>11 Q. And we're in 2021, so roughly 2019?</p> <p>12 A. Yes.</p> <p>13 Q. Were you convicted of that?</p> <p>14 A. I'm --</p> <p>09:36:26 15 MR. ANDERSON: Let me object to</p> <p>16 that. I don't know whether that is something</p> <p>17 that was a citation issue, but it was a</p> <p>18 misdemeanor. So I haven't seen the charges.</p> <p>19 So if you know the answer, answer it. If you</p> <p>09:36:41 20 don't know the way in which that matter was</p> <p>21 framed --</p> <p>22 THE WITNESS: I'll answer.</p> <p>23 Rephrase the question. Reask the question,</p> <p>24 please.</p> <p>09:36:53 25 BY MS. WEBER:</p>
<p style="text-align: right;">26</p> <p>1 misdemeanor?</p> <p>2 A. An incident that goes back 40 years comes to</p> <p>3 mind, but I don't know if I was ever</p> <p>4 convicted of, but restitution was made.</p> <p>09:34:29 5 Q. What were the charges?</p> <p>6 A. Assault and battery.</p> <p>7 Q. You said that goes back roughly 40 years, can</p> <p>8 you give me a general range of the year that</p> <p>9 may have occurred?</p> <p>09:34:46 10 A. 1972.</p> <p>11 MR. ANDERSON: That's closer to 50.</p> <p>12 THE WITNESS: Oh, God, yeah, sorry.</p> <p>13 You can see my math isn't good.</p> <p>14 BY MS. WEBER:</p> <p>09:35:01 15 Q. Have you ever been charged with any crime?</p> <p>16 A. No. I recant. Yes.</p> <p>17 Q. What crime have you been charged with?</p> <p>18 (Attorney-Client discussion off the</p> <p>19 record.)</p> <p>09:35:27 20 MR. ANDERSON: I'll object and say</p> <p>21 that it is a public record. That if counsel</p> <p>22 wants to find out what he's been charged</p> <p>23 with, then counsel is free to find out what</p> <p>24 the charges are pending against him.</p> <p>09:35:40 25 I'll instruct him not to answer.</p>	<p style="text-align: right;">28</p> <p>1 Q. I'm going to rephrase slightly.</p> <p>2 Do you know if you were found</p> <p>3 guilty in that matter?</p> <p>4 A. I'm going to qualify that. I paid a fine</p> <p>09:37:10 5 based on the inability to join a Zoom</p> <p>6 conference and because I couldn't join the</p> <p>7 Zoom conference, they found me guilty of that</p> <p>8 misdemeanor. And when I was asked to reopen</p> <p>9 the case which I had strong evidence that I</p> <p>09:37:39 10 wasn't, it was denied.</p> <p>11 Q. Where did you go to high school?</p> <p>12 A. Woodville High School.</p> <p>13 MR. ANDERSON: Hold on a second,</p> <p>14 Counsel.</p> <p>15 (Reporter read back.)</p> <p>16 MR. ANDERSON: Baldwin Woodville</p> <p>17 High School.</p> <p>18 BY MS. WEBER:</p> <p>19 Q. Did you graduate?</p> <p>09:38:26 20 A. No, I did not.</p> <p>21 Q. Did you have any other education?</p> <p>22 A. Yes, I did.</p> <p>23 Q. What education did you have?</p> <p>24 A. I took a business course for two years at the</p> <p>09:38:38 25 Minnesota School of Business.</p>

<p style="text-align: right;">29</p> <p>1 Q. Where was that located?</p> <p>2 A. Downtown Minneapolis.</p> <p>3 Q. What years did you take those courses?</p> <p>4 A. I believe 1975 to 1977.</p> <p>09:38:59 5 Q. Did you get a GED?</p> <p>6 A. Yes, I did.</p> <p>7 Q. What year did you get your GED?</p> <p>8 A. I believe that was 1975.</p> <p>9 Q. Have you had any other formal education?</p> <p>09:39:21 10 A. No.</p> <p>11 Q. Did you graduate from the Minnesota School of</p> <p>12 Business in 1977?</p> <p>13 A. No.</p> <p>14 Q. What did you do after you left school in</p> <p>09:39:50 15 1977?</p> <p>16 A. I started working for a company in Baldwin,</p> <p>17 Wisconsin, called Ideal Door.</p> <p>18 Q. What was your title there?</p> <p>19 A. I had several different positions over the</p> <p>09:40:09 20 course of eight years.</p> <p>21 Q. What years did you work at Ideal Door?</p> <p>22 A. From 1977 to 1985.</p> <p>23 Q. When you started in 1977, what was your</p> <p>24 position?</p> <p>09:40:23 25 A. I was a production worker.</p>	<p style="text-align: right;">31</p> <p>1 customers.</p> <p>2 Q. As assistant sales manager, did you manage</p> <p>3 any employees?</p> <p>4 A. No.</p> <p>09:42:42 5 Q. After you were assistant sales manager, what</p> <p>6 was your title?</p> <p>7 A. Production control manager.</p> <p>8 Q. What years did you hold that title?</p> <p>9 A. I would say from 1982 until I left in 1985.</p> <p>09:43:13 10 Q. What were your duties?</p> <p>11 A. I basically coordinated all of the customer's</p> <p>12 orders through the shop for a timely delivery</p> <p>13 as well as I was in control of the delivery</p> <p>14 truck drivers.</p> <p>09:43:43 15 Q. At any time did you own any part of that</p> <p>16 business?</p> <p>17 A. No.</p> <p>18 Q. At any time when you worked at Ideal Door,</p> <p>19 were you in charge or have any hand in</p> <p>09:44:05 20 purchasing insurance?</p> <p>21 A. No.</p> <p>22 Q. Are you aware of any insurance claims or were</p> <p>23 you involved in any insurance claims while</p> <p>24 you were at Ideal Door?</p> <p>09:44:15 25 A. From a company standpoint?</p>
<p style="text-align: right;">30</p> <p>1 Q. And what years did you hold that title?</p> <p>2 A. I probably held that title for about a year.</p> <p>3 Q. What were your duties as a production worker?</p> <p>4 A. I ran a finishing line for a garage door</p> <p>09:40:48 5 manufacturer.</p> <p>6 Q. After you held the title of production</p> <p>7 worker, what was your next title?</p> <p>8 A. I was moved to a sales position in the</p> <p>9 office.</p> <p>09:41:13 10 Q. What year was that?</p> <p>11 A. I would say approximately 1979.</p> <p>12 Q. And how long did you hold that title?</p> <p>13 A. Probably another year.</p> <p>14 Q. What were your duties in the sales office?</p> <p>09:41:37 15 A. I was basically an inside salesperson that</p> <p>16 was answering telephones from customers.</p> <p>17 Q. What was your next position?</p> <p>18 A. I was moved to assistant sales manager.</p> <p>19 Q. What year was that?</p> <p>09:41:57 20 A. 1981.</p> <p>21 Q. How long did you hold that position?</p> <p>22 A. I probably held that for another year.</p> <p>23 Q. What were your duties in that position?</p> <p>24 A. In that position, I was actively on the road</p> <p>09:42:22 25 visiting customers as well as soliciting new</p>	<p style="text-align: right;">32</p> <p>1 Q. Correct.</p> <p>2 A. No.</p> <p>3 Q. After you left Ideal Door in 1985, what did</p> <p>4 you do next for work?</p> <p>09:44:35 5 A. I started a business in Washburn, Wisconsin.</p> <p>6 Q. What was that business?</p> <p>7 A. That was a bar and restaurant business.</p> <p>8 Q. What was that bar and restaurant called?</p> <p>9 A. Pier I.</p> <p>09:44:58 10 Q. What year did you start that business?</p> <p>11 MR. ANDERSON: Asked and answered,</p> <p>12 objection.</p> <p>13 MS. WEBER: He's previously</p> <p>14 answered that he started the business after</p> <p>09:45:17 15 he left Ideal Door, but has not specified a</p> <p>16 date, so I do ask that you answer what year.</p> <p>17 MR. ANDERSON: I believe it is</p> <p>18 specified. Go ahead.</p> <p>19 THE WITNESS: 1985.</p> <p>09:45:27 20 BY MS. WEBER:</p> <p>21 Q. Were you the sole owner of that business?</p> <p>22 A. My wife would have been listed as co-owner.</p> <p>23 Q. You and your wife were the only owners of</p> <p>24 that business?</p> <p>09:45:50 25 A. Yes.</p>

<p style="text-align: right;">33</p> <p>1 Q. Can you describe that business to me?</p> <p>2 Generally, what did it do?</p> <p>3 A. Basically it was just a liquor and beer</p> <p>4 establishment that served pizzas and it was a</p> <p>09:46:16 5 live entertainment venue.</p> <p>6 Q. How was that business organized? A</p> <p>7 corporation, an LLC, or something else?</p> <p>8 A. It would have been a sole proprietorship.</p> <p>9 (Attorney-Client discussion off the</p> <p>10 record.)</p> <p>11 BY MS. WEBER:</p> <p>12 Q. Was that business registered with the state</p> <p>13 of Wisconsin?</p> <p>14 A. Yes.</p> <p>09:47:32 15 MR. ANDERSON: Hold on a second.</p> <p>16 (Attorney-Client discussion off the</p> <p>17 record.)</p> <p>18 THE WITNESS: Can I qualify?</p> <p>19 BY MS. WEBER:</p> <p>09:47:50 20 Q. Sure.</p> <p>21 A. The business was a sole proprietorship, but</p> <p>22 in answer to your registration of the state,</p> <p>23 I had to register to get the sales tax</p> <p>24 identification.</p> <p>09:48:13 25 Q. What were your responsibilities as the owner</p>	<p style="text-align: right;">35</p> <p>1 A. I owned it for three years.</p> <p>2 Q. So roughly until 1988; does that sound</p> <p>3 correct?</p> <p>4 A. That sounds correct.</p> <p>09:50:30 5 Q. Did you sell it in 1988?</p> <p>6 A. Yes.</p> <p>7 Q. Who did you sell it to?</p> <p>8 A. I believe it was Bill and Betty Brooks, and</p> <p>9 they had a partner, but I don't recall his</p> <p>09:50:47 10 name.</p> <p>11 Q. After you sold Pier I, in roughly 1988, what</p> <p>12 did you do for work next?</p> <p>13 A. I was basically with OEM Fabricators by that</p> <p>14 time.</p> <p>09:51:13 15 Q. In 1988?</p> <p>16 A. Yes.</p> <p>17 Q. You came back to OEM Fabricators. I'm sorry,</p> <p>18 I apologize. I was looking at the wrong</p> <p>19 notes.</p> <p>09:51:25 20 MR. ANDERSON: I believe there</p> <p>21 might have been some overlap, if you want to</p> <p>22 go down that road.</p> <p>23 MS. WEBER: We will.</p> <p>24 BY MS. WEBER:</p> <p>09:52:02 25 Q. Did you come in as an owner of OEM</p>
<p style="text-align: right;">34</p> <p>1 of this establishment?</p> <p>2 A. I did everything. I cleaned. I cooked. I</p> <p>3 was a bartender.</p> <p>4 Q. You said this business sold liquor and beer,</p> <p>09:48:40 5 did it have a liquor license?</p> <p>6 A. Yes.</p> <p>7 Q. Did you obtain that liquor license?</p> <p>8 A. Yes.</p> <p>9 Q. Did you obtain the insurance for the</p> <p>09:48:53 10 business?</p> <p>11 A. Yes.</p> <p>12 Q. Who was that insured through?</p> <p>13 A. I really can't remember way back that far.</p> <p>14 Q. Do you know if you used an agent?</p> <p>09:49:10 15 A. I cannot remember.</p> <p>16 Q. Do you know what type of policy you had?</p> <p>17 A. No.</p> <p>18 Q. Do you know how your limits were determined</p> <p>19 under that policy?</p> <p>09:49:42 20 A. No.</p> <p>21 Q. Did you have to have special coverage or</p> <p>22 additional coverage for live entertainment at</p> <p>23 that establishment?</p> <p>24 A. I cannot remember.</p> <p>09:49:58 25 Q. How long did you own Pier I?</p>	<p style="text-align: right;">36</p> <p>1 Fabricators right away?</p> <p>2 A. No.</p> <p>3 Q. So you started working there roughly 1988?</p> <p>4 A. 1986.</p> <p>09:52:20 5 Q. 1986. And including your ownership, you were</p> <p>6 there through 2004?</p> <p>7 A. Yes.</p> <p>8 Q. In 1986, when you started at OEM, what was</p> <p>9 your job title?</p> <p>09:52:41 10 A. Production worker.</p> <p>11 Q. What did you do as a production worker?</p> <p>12 A. Can I -- this is something that we've already</p> <p>13 done.</p> <p>14 MR. ANDERSON: I'll object. Asked</p> <p>09:52:59 15 and answered. I thought we -- we already</p> <p>16 started at the time in which he came in as a</p> <p>17 partner. So if you think you're asking him</p> <p>18 anything new, go ahead. But I think you did</p> <p>19 go down this road already.</p> <p>09:53:12 20 MS. WEBER: I think you're correct.</p> <p>21 MR. ANDERSON: Before your next</p> <p>22 question, we're closing in on the one hour</p> <p>23 mark, can we take a short break.</p> <p>24 MS. WEBER: Yes. When I get to a</p> <p>09:53:35 25 good stopping point.</p>

<p style="text-align: right;">37</p> <p>1 MR. ANDERSON: I appreciate it.</p> <p>2 BY MS. WEBER:</p> <p>3 Q. What did you do in 2004, after you -- or sold</p> <p>4 I'm sorry, OEM Fabricators?</p> <p>09:53:59 5 A. There was a period of time after 2004, for</p> <p>6 probably a year or so, that I didn't really</p> <p>7 do anything as far as occupational.</p> <p>8 Q. What was your next job after OEM Fabricators?</p> <p>9 A. Basically, I spent -- after that year of time</p> <p>09:54:30 10 off, I started refurbishing the Cubby Hole</p> <p>11 building, which wasn't the Cubby Hole at the</p> <p>12 time. It was the lumberyard building that</p> <p>13 Dayna and I owned.</p> <p>14 Q. I'm going to separate this slightly. With</p> <p>09:55:04 15 the exception of the Cubby Hole building and</p> <p>16 the businesses generally inside of the Cubby</p> <p>17 Hole, so, for purposes of this question,</p> <p>18 anything before 2005, have we discussed all</p> <p>19 of your employment after high school?</p> <p>09:55:25 20 A. No.</p> <p>21 Q. What have we missed?</p> <p>22 A. After high school, I was a construction</p> <p>23 worker.</p> <p>24 Q. Let me revise that question a little bit.</p> <p>09:55:47 25 MR. ANDERSON: I think the</p>	<p style="text-align: right;">39</p> <p>1 Q. And how long were you the co-owner of that</p> <p>2 business?</p> <p>3 A. I'm going to say approximately two years.</p> <p>4 Q. So is it fair to say until roughly 2001?</p> <p>09:58:17 5 A. I'm thinking more likely 2000.</p> <p>6 Q. What did that business do?</p> <p>7 A. They were a company who sold flooring and</p> <p>8 furniture.</p> <p>9 Q. Where was it located?</p> <p>09:58:41 10 A. Physical address, I'm not aware of for sure,</p> <p>11 but it was Woodville, Wisconsin.</p> <p>12 Q. What percentage of the business did you own?</p> <p>13 A. One-third.</p> <p>14 Q. Roughly 2000, did you sell your portion of</p> <p>09:59:10 15 the Carpet Outlet?</p> <p>16 A. Yes.</p> <p>17 Q. Who did you sell it to?</p> <p>18 A. Kathy Cook.</p> <p>19 Q. What were your responsibilities as co-owners</p> <p>09:59:31 20 at the Carpet Outlet?</p> <p>21 A. Basically, very little. All the co-owners</p> <p>22 were really not hands on. It was all Kathy's</p> <p>23 business who was an employee.</p> <p>24 Q. Did you purchase any insurance for the Carpet</p> <p>09:59:52 25 Outlet?</p>
<p style="text-align: right;">38</p> <p>1 questions you asked were after his GED in</p> <p>2 '75, dropping out of high school and</p> <p>3 obtaining his GED, so I think we're going to</p> <p>4 way back to '70, 1969, '70.</p> <p>5 BY MS. WEBER:</p> <p>6 Q. I want to drop back to 1977, after business</p> <p>7 school. Between 1977, when you finished</p> <p>8 business school, and 2005, have we talked</p> <p>9 about all of your employment?</p> <p>09:56:16 10 A. I believe we have as an employee.</p> <p>11 Q. Between 1977 and 2005, have we discussed all</p> <p>12 businesses that you've had a part or</p> <p>13 ownership in?</p> <p>14 A. No.</p> <p>09:56:47 15 Q. What have we not discussed?</p> <p>16 A. I was co-owner of a business called the</p> <p>17 Carpet Outlet.</p> <p>18 Q. When did you become co-owner of the Carpet</p> <p>19 Outlet?</p> <p>09:57:11 20 A. I would say in the area of 1999.</p> <p>21 Q. Were you the sole owner of the Carpet Outlet?</p> <p>22 You said you were the co-owner, who did you</p> <p>23 own it with?</p> <p>24 A. I owned that with Mark Tyler and James</p> <p>09:57:37 25 Hauschild.</p>	<p style="text-align: right;">40</p> <p>1 A. No.</p> <p>2 Q. Have we now talked about all businesses that</p> <p>3 you have owned from 1977 until 2005?</p> <p>4 A. No.</p> <p>10:00:17 5 Q. What businesses have we not talked about?</p> <p>6 A. Fab Express.</p> <p>7 Q. Can you spell Fab for me? Is it F-A-B?</p> <p>8 A. F-A-B.</p> <p>9 Q. Okay. Let's take a five-minute break.</p> <p>10:00:42 10 (At this time a recess was taken.)</p> <p>11 BY MS. WEBER:</p> <p>12 Q. Mr. Grant, when you became involved with the</p> <p>13 Carpet Outlet, was that business already</p> <p>14 running or were you part of starting it up?</p> <p>10:09:37 15 A. That business had started in Eau Claire and</p> <p>16 we found out that it was possibly for sale,</p> <p>17 so we purchased it.</p> <p>18 Q. Did you open a second location in Woodville</p> <p>19 or did you move the business?</p> <p>10:10:01 20 A. The business's original location was in Eau</p> <p>21 Claire. We moved it to Baldwin for a year</p> <p>22 and then we moved it to Woodville.</p> <p>23 Q. When we left for our break, you told me you</p> <p>24 were involved in a business called Fab</p> <p>10:10:36 25 Express, can you tell me what that business</p>

<p style="text-align: right;">41</p> <p>1 was?</p> <p>2 A. That business was a separate company to</p> <p>3 enhance OEM Fabricators. A lot of our</p> <p>4 customers needed product more or less in a</p> <p>10:10:51 5 emergency fashion, and this was geared up</p> <p>6 with a crew and equipment that would take</p> <p>7 orders on that basis and produce them timely.</p> <p>8 Q. And you were involved in starting this</p> <p>9 business?</p> <p>10:11:10 10 A. Yes.</p> <p>11 Q. What year did you start this business?</p> <p>12 A. Approximately 2000.</p> <p>13 Q. And how long were a part of this business?</p> <p>14 A. Until the business was disbanded in</p> <p>10:11:34 15 approximately 2003.</p> <p>16 Q. Were you the sole owner or did you have</p> <p>17 co-owners to this business?</p> <p>18 A. Co-owners.</p> <p>19 Q. Who were the co-owners?</p> <p>10:11:51 20 A. Mark Tyler and James Hauschild.</p> <p>21 Q. Did you each own one-third?</p> <p>22 A. Yes.</p> <p>23 MR. ANDERSON: Can we get spelling</p> <p>24 on James Hauschild's name?</p> <p>10:12:01 25 THE WITNESS: H-A-U-S-C-H-I-L-D.</p>	<p style="text-align: right;">43</p> <p>1 A. Yes.</p> <p>2 Q. Who was that?</p> <p>3 A. Mark Tyler.</p> <p>4 Q. Were you an owner or involved in any other</p> <p>10:14:25 5 businesses that we have not discussed between</p> <p>6 1977 and 2005?</p> <p>7 A. Yes.</p> <p>8 Q. What business?</p> <p>9 A. OEM Machine, Incorporated.</p> <p>10:14:41 10 Q. Did you start OEM Machine, Incorporated, or</p> <p>11 did you purchase it?</p> <p>12 A. We started OEM Machine, Incorporated, but it</p> <p>13 was basically a result of purchasing a</p> <p>14 different company.</p> <p>10:14:55 15 Q. What company did you purchase that resulted</p> <p>16 in the start-up of OEM Machine?</p> <p>17 A. I can't remember the name.</p> <p>18 Q. What year did you purchase that business?</p> <p>19 A. 2000.</p> <p>10:15:33 20 Q. Did you also start OEM Machine, Incorporated</p> <p>21 in 2000?</p> <p>22 A. Yes.</p> <p>23 Q. And how long were you a part of OEM Machine,</p> <p>24 Incorporated?</p> <p>10:15:50 25 A. Until it was disbanded in 2002.</p>
<p style="text-align: right;">42</p> <p>1 BY MS. WEBER:</p> <p>2 Q. Was this business registered with the state</p> <p>3 of Wisconsin?</p> <p>4 A. Yes.</p> <p>10:12:36 5 Q. I should ask you: Was this business located</p> <p>6 in Wisconsin?</p> <p>7 A. Yes.</p> <p>8 Q. Where was it located?</p> <p>9 A. Woodville, Wisconsin.</p> <p>10:12:49 10 Q. And how was this business organized, for</p> <p>11 example, was it a corporation or an LLC or</p> <p>12 otherwise?</p> <p>13 A. I don't know for sure. It would have been a</p> <p>14 corporation or an LLC.</p> <p>10:13:16 15 Q. What were your responsibilities for Fab</p> <p>16 Express?</p> <p>17 A. I had no direct involvement.</p> <p>18 Q. Who managed the business for you?</p> <p>19 A. A gentleman called Kent Radunzel.</p> <p>10:13:47 20 Q. Can you spell that for us?</p> <p>21 A. R-A-D-U-N-Z-E-L.</p> <p>22 Q. Did you have any hand in purchasing the</p> <p>23 insurance for this business?</p> <p>24 A. No.</p> <p>10:14:02 25 Q. Do you know who did?</p>	<p style="text-align: right;">44</p> <p>1 Q. Was OEM Machine a corporation?</p> <p>2 A. Yes.</p> <p>3 Q. Under the laws of Wisconsin?</p> <p>4 A. No.</p> <p>10:16:07 5 Q. What state?</p> <p>6 A. Minnesota.</p> <p>7 Q. Where was OEM Machine located?</p> <p>8 A. Sauk Rapids, Minnesota.</p> <p>9 Q. Did you have business partners with OEM</p> <p>10:16:39 10 Machine, Incorporated?</p> <p>11 A. Yes.</p> <p>12 Q. Who are they?</p> <p>13 A. Mark Tyler and James Hauschild.</p> <p>14 Q. Did you each own one-third of the business?</p> <p>10:16:49 15 A. Yes.</p> <p>16 Q. What was your role with OEM Machine,</p> <p>17 Incorporated?</p> <p>18 A. I was the general manager.</p> <p>19 Q. What did you do as general manager?</p> <p>10:17:08 20 A. I oversaw the operations of the production</p> <p>21 and sales at the Sauk Rapids facility.</p> <p>22 Q. Did you live in Sauk Rapids at the time.</p> <p>23 A. Yes.</p> <p>24 Q. Were you in charge of purchasing insurance</p> <p>10:17:43 25 for this business?</p>

<p style="text-align: right;">45</p> <p>1 A. No.</p> <p>2 Q. Who was?</p> <p>3 A. Mark Tyler.</p> <p>4 Q. Have we now talked about all businesses</p> <p>10:18:09 5 you've owned or been a part of from 1977 to</p> <p>6 2005?</p> <p>7 A. No.</p> <p>8 Q. What other businesses?</p> <p>9 A. Venture Properties.</p> <p>10:18:22 10 Q. Were you the sole owner of Venture</p> <p>11 Properties?</p> <p>12 A. No.</p> <p>13 Q. Who were the other individuals?</p> <p>14 A. James Hauschild and Warren Helgeson.</p> <p>10:18:37 15 Q. Can you spell that for us?</p> <p>16 A. H-E-L-G-E-S-O-N.</p> <p>17 Q. What was the first name?</p> <p>18 A. Warren.</p> <p>19 Q. Did you each own equal shares of that</p> <p>10:18:55 20 business?</p> <p>21 A. Yes.</p> <p>22 Q. Did you start that business or did you</p> <p>23 acquire it?</p> <p>24 A. We started that business.</p> <p>10:19:05 25 Q. When did you start it?</p>	<p style="text-align: right;">47</p> <p>1 A. I was in charge of renting them and</p> <p>2 advertising vacancies, collecting rent.</p> <p>3 Q. Was Venture Properties registered with the</p> <p>4 state of Wisconsin?</p> <p>10:21:15 5 A. I don't think so.</p> <p>6 Q. So it was not an LLC or a corporation or</p> <p>7 other business organization?</p> <p>8 A. It was a partnership.</p> <p>9 Q. Were you in charge of purchasing insurance</p> <p>10:21:44 10 for Venture Properties business or the</p> <p>11 properties which it owned?</p> <p>12 A. No.</p> <p>13 Q. Who was?</p> <p>14 A. Mark Tyler.</p> <p>10:21:53 15 Q. In your role as renting out the properties,</p> <p>16 did you deal with lease agreements?</p> <p>17 A. Yes.</p> <p>18 Q. Did you have an attorney draft these lease</p> <p>19 agreements?</p> <p>10:22:27 20 A. No.</p> <p>21 Q. Did you draft the lease agreements?</p> <p>22 A. No.</p> <p>23 Q. Who drafted the lease agreements?</p> <p>24 A. Mark Tyler.</p> <p>10:22:34 25 Q. Did you read or review these lease</p>
<p style="text-align: right;">46</p> <p>1 A. 1997.</p> <p>2 Q. And how long were you a part of that</p> <p>3 business?</p> <p>4 A. I would say approximately three years.</p> <p>10:19:32 5 Q. Until roughly 2000?</p> <p>6 A. Yes.</p> <p>7 Q. Did you sell your portion of that business or</p> <p>8 did it close down?</p> <p>9 A. The business sold all the properties that it</p> <p>10:19:48 10 owned, so basically we closed it up as</p> <p>11 collectively.</p> <p>12 Q. Where was Venture Properties located?</p> <p>13 A. I think we ran it out of the OEM Fabricators</p> <p>14 offices.</p> <p>10:20:15 15 Q. And what did Venture Properties do?</p> <p>16 A. We built duplexes and rented them out.</p> <p>17 Q. Roughly, how many properties did Venture</p> <p>18 Properties build?</p> <p>19 A. Three.</p> <p>10:20:35 20 Q. Where were they located in?</p> <p>21 A. In Woodville, Wisconsin.</p> <p>22 Q. All three?</p> <p>23 A. Yes.</p> <p>24 Q. What were your responsibilities related to</p> <p>10:20:56 25 Venture Properties?</p>	<p style="text-align: right;">48</p> <p>1 agreements?</p> <p>2 A. Yes.</p> <p>3 Q. In your role at Venture Properties being in</p> <p>4 charge of advertising, what type of</p> <p>10:23:06 5 advertising did you do?</p> <p>6 A. If a vacancy came up, we would basically just</p> <p>7 put it in the newspaper.</p> <p>8 Q. Is the newspaper the only way you would</p> <p>9 advertise those vacancies?</p> <p>10:23:22 10 A. Word of mouth.</p> <p>11 Q. Did you run any ads on billboards or the</p> <p>12 radio?</p> <p>13 A. No.</p> <p>14 Q. Were there any other businesses that you</p> <p>10:23:59 15 owned or were involved with between 1977 and</p> <p>16 2005?</p> <p>17 A. I think we've covered them.</p> <p>18 Q. If you think of any others, just let me know.</p> <p>19 A. I will.</p> <p>10:24:13 20 Q. In a couple of different positions that</p> <p>21 you've held that we have discussed, as well</p> <p>22 as some of the businesses you've owned,</p> <p>23 you've been involved in production.</p> <p>24 Did you have any on-the-job</p> <p>10:24:50 25 training for production?</p>

<p style="text-align: right;">49</p> <p>1 A. No.</p> <p>2 Q. Did you have any classes or informal training</p> <p>3 on the job between 1977 and 2005?</p> <p>4 A. I had a welding class at WITC in New</p> <p>10:25:25 5 Richmond, Wisconsin. And when you say on the</p> <p>6 job, I would have had experience when I first</p> <p>7 started with OEM in those various positions.</p> <p>8 Q. Did you have any continuing education in</p> <p>9 those positions; maybe, for example, on new</p> <p>10:25:51 10 machines or updated safety procedures?</p> <p>11 A. No.</p> <p>12 Q. Do you hold any certificates that we have not</p> <p>13 talked about?</p> <p>14 A. Yes.</p> <p>10:26:11 15 Q. What certificates do you hold?</p> <p>16 A. I have a pilot's certificate.</p> <p>17 Q. When did you get your pilot certificate?</p> <p>18 A. 1985.</p> <p>19 Q. Is that active today?</p> <p>10:26:27 20 A. Yes.</p> <p>21 Q. Do you hold any other certificates?</p> <p>22 A. No.</p> <p>23 Q. Have you had any other formal education that</p> <p>24 we've not discussed?</p> <p>10:26:53 25 A. No.</p>	<p style="text-align: right;">51</p> <p>1 Street.</p> <p>2 Q. Did you own any land or any buildings related</p> <p>3 to this business?</p> <p>4 A. No.</p> <p>10:25:58 5 Q. What did Delivery Central do, generally?</p> <p>6 A. We had a captive contract with the Menards</p> <p>7 Hudson store and delivered their items that</p> <p>8 customers wanted delivered.</p> <p>9 Q. So would you pick up at the Menards and then</p> <p>10:29:23 10 bring to customers' residences?</p> <p>11 A. Yes.</p> <p>12 Q. Did you own any equipment for Delivery</p> <p>13 Central?</p> <p>14 A. Yes.</p> <p>10:29:32 15 Q. What equipment did you own?</p> <p>16 A. A truck, a handcart and tools.</p> <p>17 Q. What size was that truck?</p> <p>18 A. It was 16-foot dry van.</p> <p>19 Q. Who was that truck registered to?</p> <p>10:30:01 20 A. Myself.</p> <p>21 Q. Did you purchase the insurance on that</p> <p>22 vehicle?</p> <p>23 A. Yes.</p> <p>24 Q. Who was that insurance purchased through?</p> <p>10:30:16 25 A. I believe it was Rural Mutual.</p>
<p style="text-align: right;">50</p> <p>1 Q. Excluding the business, which we're going to</p> <p>2 generally refer to as the Cubby Hole</p> <p>3 building, the entire building, after 2005,</p> <p>4 have you been employed anywhere?</p> <p>10:27:16 5 A. Self-employed.</p> <p>6 Q. And what did you do?</p> <p>7 A. I started and ran a delivery company.</p> <p>8 Q. What was that company called?</p> <p>9 A. Delivery Central.</p> <p>10:27:39 10 Q. Were you the sole owner of Delivery Central?</p> <p>11 A. Yes.</p> <p>12 Q. When did you start that business?</p> <p>13 A. 2009.</p> <p>14 Q. Do you own it still today?</p> <p>10:27:52 15 A. No.</p> <p>16 Q. When did you sell it or close it?</p> <p>17 A. We sold it in 2013.</p> <p>18 Q. Was Delivery Central registered under the</p> <p>19 laws of Wisconsin?</p> <p>10:28:11 20 A. Yes.</p> <p>21 Q. What was it registered as?</p> <p>22 A. Delivery Central, LLC.</p> <p>23 Q. Where was Delivery Central's headquarters</p> <p>24 located?</p> <p>10:28:29 25 A. At my residence at the time. 1253 250th</p>	<p style="text-align: right;">52</p> <p>1 Q. Did you purchase it through an agent?</p> <p>2 A. Yes.</p> <p>3 Q. Who was that agent?</p> <p>4 A. I believe his name was Ron Singerhouse.</p> <p>10:30:38 5 Q. Can you spell Singerhouse for us?</p> <p>6 A. S-I-N-G-E-R-H-O-U-S-E.</p> <p>7 Q. Did you ever have any claims under that</p> <p>8 policy?</p> <p>9 A. Yes.</p> <p>10:31:10 10 Q. What claims did you have?</p> <p>11 A. It was for a water leak in a refrigerator</p> <p>12 that I hooked up and apparently it leaked and</p> <p>13 destroyed a floor.</p> <p>14 Q. What did this policy cover?</p> <p>10:31:30 15 A. The policy was basically a truck contents and</p> <p>16 liability.</p> <p>17 (Attorney-Client off the record</p> <p>18 discussion.)</p> <p>19 MS. WEBER: Counsel, I know I've</p> <p>10:31:45 20 given you some leeway today.</p> <p>21 MR. ANDERSON: That's fine. I just</p> <p>22 wanted -- fine. Go ahead. He spoke about</p> <p>23 installing, he said earlier it was delivery,</p> <p>24 so I just want to have the record clear. It</p> <p>10:31:58 25 sounds like he did more than just delivery.</p>

<p style="text-align: right;">53</p> <p>1 MS. WEBER: I will clarify.</p> <p>2 MR. ANDERSON: Okay.</p> <p>3 MS. WEBER: Can you read the last</p> <p>4 question?</p> <p>10:32:30 5 (Reporter Read Back.)</p> <p>6 BY MS. WEBER:</p> <p>7 Q. And you said you had a water leak and</p> <p>8 refrigerator that destroyed a floor that you</p> <p>9 made a claim for under this policy?</p> <p>10:32:43 10 A. Yes.</p> <p>11 Q. Explain to me where this refrigerator was?</p> <p>12 A. In a kitchen in a house in Hudson.</p> <p>13 Q. So the policy covered the truck contents and</p> <p>14 liability as well as other locations?</p> <p>10:32:57 15 A. The liability was for that specific purpose.</p> <p>16 Q. Okay. So the liability wasn't just vehicle</p> <p>17 liability?</p> <p>18 A. No. It was for the type of service I was</p> <p>19 offering.</p> <p>10:33:13 20 Q. So besides delivery services, what other</p> <p>21 services did Delivery Central offer?</p> <p>22 A. It was part of a Menards contract. A</p> <p>23 delivery person would install certain</p> <p>24 appliances if the customer paid extra for</p> <p>10:33:33 25 that. It was limited to anything that didn't</p>	<p style="text-align: right;">55</p> <p>1 A. Almost 42 years.</p> <p>2 Q. Congratulations. Were you ever married prior</p> <p>3 to Dayna?</p> <p>4 A. Yes. Her name was Faye Niccum, N-I-C-C-U-M.</p> <p>10:35:43 5 Q. When did you marry Faye?</p> <p>6 A. In April of 1971.</p> <p>7 Q. And when did you divorce?</p> <p>8 A. In the fall of 1975.</p> <p>9 Q. You and Dayna have been together for</p> <p>10:36:07 10 42 years, but my math is terrible, what year</p> <p>11 did you get married?</p> <p>12 A. 1980.</p> <p>13 Q. Are those your only two marriages?</p> <p>14 A. Yes.</p> <p>10:36:19 15 Q. Do you have any children?</p> <p>16 A. Yes.</p> <p>17 Q. How many children do you have?</p> <p>18 A. Three.</p> <p>19 Q. How many daughters and how many sons?</p> <p>10:36:29 20 A. Three daughters.</p> <p>21 Q. What is your oldest daughter's name?</p> <p>22 A. Megan. M-E-G-A-N.</p> <p>23 Q. When about was Megan born?</p> <p>24 A. November 22, 1971.</p> <p>10:36:49 25 Q. Is Faye then Megan's mother?</p>
<p style="text-align: right;">54</p> <p>1 include electrical or plumbing.</p> <p>2 Q. So this claim was for a refrigerator that was</p> <p>3 installed by Delivery Central that leaked?</p> <p>4 A. Yes.</p> <p>10:33:56 5 Q. Did you have any other claims under that</p> <p>6 policy?</p> <p>7 A. I don't believe so.</p> <p>8 Q. Did you have any employees with Delivery</p> <p>9 Central?</p> <p>10:34:14 10 A. No.</p> <p>11 Q. Who did you sell that to in 2013?</p> <p>12 A. Shannon Peterson.</p> <p>13 Q. Have you had any other employment between</p> <p>14 2005 and today?</p> <p>10:34:54 15 A. No.</p> <p>16 Q. Have you owned any other businesses with the</p> <p>17 exception of the building and businesses</p> <p>18 contained in the Cubby Hole building between</p> <p>19 2005 and today?</p> <p>10:35:08 20 A. No.</p> <p>21 Q. And you are currently married?</p> <p>22 A. Yes.</p> <p>23 Q. Who are you married to?</p> <p>24 A. Her name is Dayna, D-A-Y-N-A, Grant.</p> <p>10:35:26 25 Q. How long have you been married to Dayna?</p>	<p style="text-align: right;">56</p> <p>1 A. Yes.</p> <p>2 Q. Where does Megan live now?</p> <p>3 A. In Annandale, Minnesota.</p> <p>4 Q. And who is your next oldest daughter?</p> <p>10:37:14 5 A. Melanie. M-E-L-A-N-I-E.</p> <p>6 Q. And when was Melanie born?</p> <p>7 A. January 25, 1974.</p> <p>8 Q. Is Faye also Melanie's mother?</p> <p>9 A. Yes.</p> <p>10:37:29 10 Q. Where does Melanie live now?</p> <p>11 A. Brooklyn Center, Minnesota.</p> <p>12 Q. And who's your youngest daughter?</p> <p>13 A. Polly. P-O-L-L-Y.</p> <p>14 Q. And when was Polly born?</p> <p>10:37:48 15 A. August 2, 1980.</p> <p>16 Q. Is Dayna Polly's mother?</p> <p>17 A. Yes.</p> <p>18 Q. And where does Polly live now?</p> <p>19 A. She lives in Woodville, Wisconsin.</p> <p>10:38:05 20 Q. Do you have any grandchildren?</p> <p>21 A. Yes.</p> <p>22 Q. How many grandchildren do you have?</p> <p>23 A. Eight.</p> <p>24 Q. You have eight grandchildren.</p> <p>10:38:14 25 Congratulations.</p>

<p style="text-align: right;">57</p> <p>1 A. Yes.</p> <p>2 MR. ANDERSON: Do we need all the</p> <p>3 names, counsel?</p> <p>4 MS. WEBER: No.</p> <p>10:38:19 5 MR. ANDERSON: Okay. Thank you.</p> <p>6 BY MS. WEBER:</p> <p>7 Q. What type of insurance policies do you hold</p> <p>8 currently?</p> <p>9 A. What type?</p> <p>10:38:41 10 Q. Yes.</p> <p>11 A. We have property insurance. We have car</p> <p>12 insurance. And when I say property,</p> <p>13 homeowners. That would be, I believe, it.</p> <p>14 Q. Do you have any boat insurance?</p> <p>10:39:08 15 A. No.</p> <p>16 Q. Specific policies for motorhomes?</p> <p>17 A. Yes.</p> <p>18 Q. Any business policies?</p> <p>19 A. No.</p> <p>10:39:20 20 Q. Do you have an umbrella policy?</p> <p>21 A. No.</p> <p>22 Q. How about any renters policies?</p> <p>23 A. No.</p> <p>24 Q. Life insurance?</p> <p>10:39:31 25 A. No.</p>	<p style="text-align: right;">59</p> <p>1 BY MS. WEBER:</p> <p>2 Q. Who is your homeowners policy currently</p> <p>3 through?</p> <p>4 A. It is through Auto-Owners.</p> <p>10:41:36 5 Q. And how long have you been with Auto-Owners</p> <p>6 for your homeowners policy?</p> <p>7 A. I would say three years.</p> <p>8 Q. So since roughly 2018?</p> <p>9 A. Yes.</p> <p>10:41:58 10 Q. Who insured your home prior to that?</p> <p>11 A. State Farm.</p> <p>12 Q. And who's your current auto owners company?</p> <p>13 A. Auto-Owners.</p> <p>14 Q. Sorry. That was a bad question. Let me</p> <p>10:42:26 15 rephrase that just to confirm.</p> <p>16 Who is your current car insurance</p> <p>17 policy through?</p> <p>18 A. Auto-Owners.</p> <p>19 Q. And the policy that covers your motorhome,</p> <p>10:42:43 20 who's that through?</p> <p>21 A. Auto-Owners.</p> <p>22 Q. When did you obtain the Auto-Owners car</p> <p>23 insurance policy?</p> <p>24 A. That would have been just earlier than the</p> <p>10:43:00 25 homeowners, but still 2018, I believe.</p>
<p style="text-align: right;">58</p> <p>1 Q. Any disability insurance?</p> <p>2 A. No.</p> <p>3 Q. Who purchases the insurance policies?</p> <p>4 A. At this time, I do.</p> <p>10:39:44 5 Q. Have you held any other types of insurance</p> <p>6 policies in the past?</p> <p>7 A. I've had an aircraft insurance policy years</p> <p>8 ago. I had the business policy when I ran</p> <p>9 Delivery Central. I think that's it.</p> <p>10:40:23 10 Q. And you also had the business policy that</p> <p>11 we're here today for, correct?</p> <p>12 A. Yes, yes.</p> <p>13 Q. When did you buy your first home?</p> <p>14 A. 1980.</p> <p>10:40:50 15 Q. Did you purchase homeowners insurance at that</p> <p>16 time?</p> <p>17 A. Yes.</p> <p>18 Q. Have you had homeowners insurance since that</p> <p>19 time?</p> <p>10:41:03 20 A. Yes.</p> <p>21 Q. Have you had homeowners insurance</p> <p>22 consistently since that time?</p> <p>23 A. Yes.</p> <p>24 MR. ANDERSON: Wait for her to</p> <p>10:41:15 25 finish her question before you answer.</p>	<p style="text-align: right;">60</p> <p>1 Q. And how about the motorhome policy, when did</p> <p>2 you obtain that through Auto-Owners?</p> <p>3 A. That would have been probably the same time</p> <p>4 as the autos.</p> <p>10:43:16 5 Q. Did you purchase these policies through an</p> <p>6 agent?</p> <p>7 A. Yes.</p> <p>8 Q. Who is the agent?</p> <p>9 A. His name is Al Duchnowski.</p> <p>10:43:28 10 Q. Can you spell that for us?</p> <p>11 A. D-U-C-H-N-O-W-S-K-I.</p> <p>12 Q. Where is he located?</p> <p>13 A. He is in Hudson, Wisconsin.</p> <p>14 Q. Do you know the name of his business or</p> <p>10:43:53 15 agency?</p> <p>16 A. His agency is FS Insurance Group.</p> <p>17 Q. Do they deal with specifically Auto-Owners or</p> <p>18 do they sell all types of policies?</p> <p>19 A. He's a broker so he's got access to almost</p> <p>10:44:09 20 everybody.</p> <p>21 Q. Who was your car -- your vehicles, your car</p> <p>22 insurance through prior to Auto-Owners?</p> <p>23 A. State Farm.</p> <p>24 Q. And how about your motorhome policy?</p> <p>10:44:25 25 A. State Farm.</p>

<p style="text-align: right;">61</p> <p>1 Q. How do you communicate with your current 2 insurance agent? 3 A. Both by phone and personal visits. 4 Q. Do you e-mail him at all? 10:44:45 5 A. Not normally. 6 Q. Do you deal directly with him or somebody in 7 his office? 8 A. I try to deal with him, but every once in a 9 while I deal with one of his assistants. 10:45:04 10 Q. Do you ever communicate directly with 11 Auto-Owners? 12 A. No. 13 Q. You had an aircraft policy prior, who was 14 that through? 10:45:22 15 A. That company is called Wings, Incorporated. 16 Q. Did you purchase that through an agent? 17 A. I believe that was done all online. 18 Q. How did you communicate with Wings? 19 A. Through the e-mail process. 10:45:45 20 Q. Did you ever have any claims against your 21 Wings policy? 22 A. No. 23 Q. Who was your insurance policy for Delivery 24 Central through? 10:46:09 25 A. I think that was the Rural Mutual.</p>	<p style="text-align: right;">63</p> <p>1 Q. How do you pay your Auto-Owners policies now? 2 A. Automatic withdrawal from a credit card. I 3 guess that's automatic payment through a 4 credit card. 10:48:45 5 Q. And do your premiums for all of your policies 6 with Auto-Owners come out at once or do they 7 come out at separate times? 8 A. Separate times. 9 Q. How frequently do you make your car insurance 10 payments? 10:49:05 11 A. Monthly. 12 Q. How about your homeowners payments? 13 A. Homeowners is monthly. 14 Q. And your motorhome policy? 10:49:19 15 A. Monthly. 16 Q. Prior to Auto-Owners, you had car insurance, 17 homeowners insurance, business insurance and 18 motorhome insurance through State Farm; is 19 that correct? 10:49:55 20 A. Yes. 21 Q. Did you have any other insurance with State 22 Farm? 23 A. They may have had an umbrella policy as well. 24 Q. On your current car insurance, what are your 10:50:25 25 policy limits?</p>
<p style="text-align: right;">62</p> <p>1 Q. Yes. We talked about that. Your agent for 2 that was Ron Singerhouse? 3 A. Yes. 4 Q. How did you communicate with Mr. Singerhouse? 10:46:37 5 A. Usually in person. 6 Q. Did you ever deal directly with the insurance 7 company or only through the agent? 8 A. Just the agent. 9 Q. Did you ever have any claims against that 10 policy? Oh, I'm sorry, we have already 10:47:02 11 discussed that. Strike that question. 12 How did you pay premiums on that 13 policy? 14 A. Always by check. 10:47:18 15 Q. How frequently did you pay those premiums? 16 A. I think -- I think it was a monthly payment. 17 Q. And your Wings aircraft policy, how did you 18 pay for that? 19 A. Those were usually semiannual payments. 10:47:56 20 Q. Did you write a check for that? 21 A. Yes. 22 Q. When did you purchase that Wings policy? 23 A. Mid-1990s. 24 Q. And how long did you have it? 10:48:17 25 A. Not very long. Maybe a year.</p>	<p style="text-align: right;">64</p> <p>1 A. I don't know for sure. 2 Q. Can you give me an estimate? 3 MR. ANDERSON: Objection. You're 4 asking him to speculate. 10:50:45 5 BY MS. WEBER: 6 Q. Go ahead and answer. 7 MR. ANDERSON: You can answer. 8 THE WITNESS: I think it's the 9 state requirement, which is -- is it a 10:50:57 10 million dollar liability and 500,000 injury? 11 BY MS. WEBER: 12 Q. What are the limits on your homeowners 13 insurance? 14 A. Without referring to the policy to date, I 10:51:22 15 don't know. 16 Q. Do you receive your declarations for that 17 policy regularly? 18 A. I think I've only received a declaration for 19 that policy once. 10:51:41 20 Q. When was that? 21 A. When we took the insurance out in 2018. 22 Q. How did you receive those declarations? 23 A. By mail. 24 Q. Did you save them? 10:51:52 25 A. Yes.</p>

<p style="text-align: right;">65</p> <p>1 Q. Do you put them in a certain location?</p> <p>2 A. They're filed.</p> <p>3 Q. Do you keep those files at your home?</p> <p>4 A. Yes.</p> <p>10:52:03 5 Q. Do you know the policy limits on your</p> <p>6 Auto-Owners motorhome policy?</p> <p>7 A. No, I do not.</p> <p>8 Q. Besides the claim made with Rural Mutual for</p> <p>9 the refrigerator leak, have you made any</p> <p>10:52:53 10 other claims against your business insurance</p> <p>11 in the past? Any business insurance.</p> <p>12 A. Business insurance, the only one that I can</p> <p>13 think of is the fire.</p> <p>14 Q. Have you made any car insurance claims</p> <p>10:53:16 15 against your insurance in the past?</p> <p>16 A. Yes.</p> <p>17 Q. When was the first one that you can think of?</p> <p>18 A. Probably, 2014.</p> <p>19 Q. And what was that for?</p> <p>10:53:43 20 A. Dayna hit a deer.</p> <p>21 Q. All too common around here, isn't it?</p> <p>22 A. (Nodding.)</p> <p>23 MR. ANDERSON: You can answer her</p> <p>24 question.</p> <p>10:54:01 25 THE WITNESS: Yes.</p>	<p style="text-align: right;">67</p> <p>1 A. That was probably 2016.</p> <p>2 Q. And who was your insurance company at that</p> <p>3 time?</p> <p>4 A. State Farm.</p> <p>10:56:01 5 Q. And was that claim paid, your tow bill paid?</p> <p>6 A. Yes.</p> <p>7 Q. Did you work directly with State Farm or</p> <p>8 through an agent?</p> <p>9 A. Through the agent.</p> <p>10:56:15 10 Q. And for this claim, did you communicate with</p> <p>11 him via phone?</p> <p>12 A. Yes.</p> <p>13 Q. Directly with him?</p> <p>14 A. Yes.</p> <p>10:56:21 15 Q. And this was Chris LaMay.</p> <p>16 A. Chris LaMay.</p> <p>17 Q. Any other car insurance claims that you have</p> <p>18 made in your lifetime that you can think of?</p> <p>19 A. Yes.</p> <p>10:56:34 20 Q. What else?</p> <p>21 A. I had a 1982 Toyota that burned.</p> <p>22 Q. What year was that?</p> <p>23 A. 1982.</p> <p>24 Q. Brand new vehicle?</p> <p>10:56:47 25 A. Brand new vehicle.</p>
<p style="text-align: right;">66</p> <p>1 MR. ANDERSON: You just nodded and</p> <p>2 she gave instructions earlier about no</p> <p>3 nodding.</p> <p>4 BY MS. WEBER:</p> <p>10:54:05 5 Q. Who is the company that claim was made to?</p> <p>6 A. That one may have been State Farm.</p> <p>7 Q. Was that claim paid?</p> <p>8 A. Yes.</p> <p>9 Q. How did you make that claim? For example,</p> <p>10:54:48 10 did you do it through the agent or directly</p> <p>11 through the company?</p> <p>12 A. Through the agent.</p> <p>13 Q. Who was the agent on that?</p> <p>14 A. Chris LaMay.</p> <p>10:55:02 15 Q. And how did you communicate with Mr. LaMay?</p> <p>16 A. By telephone.</p> <p>17 Q. Did you talk to him directly or somebody in</p> <p>18 his office?</p> <p>19 A. I believe it was him directly.</p> <p>10:55:13 20 Q. Any other car insurance claims that you can</p> <p>21 think of?</p> <p>22 A. The only other one I can think of is I slid</p> <p>23 off the road in a snowstorm and couldn't get</p> <p>24 out, so I had a tow claim.</p> <p>10:55:46 25 Q. What year was that?</p>	<p style="text-align: right;">68</p> <p>1 Q. Do you know who your insurance company was?</p> <p>2 A. Farmers Insurance.</p> <p>3 Q. And was that claim paid?</p> <p>4 A. Yes.</p> <p>10:57:00 5 Q. Did you work through an agent for that claim?</p> <p>6 A. Yes.</p> <p>7 Q. Do you remember who your agent was?</p> <p>8 A. Gary Stang.</p> <p>9 Q. And just for the record, can you spell that</p> <p>10:57:13 10 for us?</p> <p>11 A. S-T-A-N-G.</p> <p>12 Q. How did you communicate with Mr. Stang?</p> <p>13 A. In person.</p> <p>14 Q. Any other car insurance claims?</p> <p>10:57:42 15 A. One, I think. Dayna got backed into.</p> <p>16 Q. When was that?</p> <p>17 A. 2015.</p> <p>18 Q. Was that claim paid?</p> <p>19 A. It was.</p> <p>10:58:10 20 Q. And who was your insurance company at that</p> <p>21 time?</p> <p>22 A. I believe that was State Farm.</p> <p>23 Q. Did you work through an agent for that claim?</p> <p>24 A. I think it was worked through the other car</p> <p>10:58:30 25 insurance agent, but I don't know who that</p>

<p style="text-align: right;">69</p> <p>1 was.</p> <p>2 Q. Any other car insurance claims that you've</p> <p>3 made that you can think of?</p> <p>4 A. That is all that I can think of.</p> <p>10:58:48 5 Q. Any homeowners insurance claims that you've</p> <p>6 made in the past?</p> <p>7 A. Yes.</p> <p>8 Q. When is the first one?</p> <p>9 A. The first one would have been about 2013.</p> <p>10:59:32 10 Q. What was that for?</p> <p>11 A. A robbery.</p> <p>12 Q. And who was that claim made to, what company?</p> <p>13 A. That was State Farm.</p> <p>14 Q. Was that claim paid?</p> <p>10:59:48 15 A. Yes.</p> <p>16 Q. At what property did this occur?</p> <p>17 A. This occurred at a lake cabin in Chetek,</p> <p>18 Wisconsin.</p> <p>19 Q. Can you spell Chetek for me?</p> <p>11:00:03 20 A. C-H-E-T-E-K.</p> <p>21 Q. What kind of policy do you have -- or was</p> <p>22 that policy that State Farm that insured that</p> <p>23 company?</p> <p>24 A. That was a personal property extension of our</p> <p>11:00:28 25 homeowners.</p>	<p style="text-align: right;">71</p> <p>1 A. That was for our residence at 1253 250th</p> <p>2 Street.</p> <p>3 Q. Did you work directly with the broker or</p> <p>4 agent for that claim?</p> <p>11:02:00 5 A. We worked through an adjuster for that claim.</p> <p>6 Q. Who was that adjuster?</p> <p>7 A. I cannot recall who that was.</p> <p>8 Q. Was that claim paid?</p> <p>9 A. Yes.</p> <p>11:02:17 10 Q. Any other homeowners claims?</p> <p>11 A. One more that I can think of. Most recently,</p> <p>12 wind damage.</p> <p>13 Q. What year was that?</p> <p>14 A. 2021.</p> <p>11:02:32 15 Q. That was through Auto-Owners?</p> <p>16 A. Yes.</p> <p>17 Q. Did you work with an agent or did you work</p> <p>18 directly with the company?</p> <p>19 A. An agent.</p> <p>11:02:51 20 Q. How did you communicate with that agent?</p> <p>21 A. By telephone.</p> <p>22 Q. And directly with the agent or somebody in</p> <p>23 the office?</p> <p>24 A. Directly with the agent.</p> <p>11:03:04 25 Q. And what property was that damage to?</p>
<p style="text-align: right;">70</p> <p>1 Q. Do you know the limits of that personal</p> <p>2 property extension?</p> <p>3 A. No, I do not.</p> <p>4 Q. And did you work this claim with an agent or</p> <p>11:00:46 5 did you make it directly through the company?</p> <p>6 A. Through an agent.</p> <p>7 Q. And was that agent also Chris LaMay?</p> <p>8 A. Yes, it was.</p> <p>9 Q. Did you communicate with him for this claim</p> <p>11:00:58 10 via phone?</p> <p>11 A. Yes.</p> <p>12 Q. And with him directly?</p> <p>13 A. Yes.</p> <p>14 Q. Any other homeowners claims?</p> <p>11:01:10 15 A. There was one prior to that one.</p> <p>16 Q. What year?</p> <p>17 A. 2007.</p> <p>18 Q. And what happened?</p> <p>19 A. Wind damage.</p> <p>11:01:19 20 Q. Who was that insurance policy through?</p> <p>21 A. The policy, I don't know who it was through,</p> <p>22 but the broker was Kado & Associates.</p> <p>23 Q. Spell Kado?</p> <p>24 A. K-A-D-O.</p> <p>11:01:37 25 Q. What property was that?</p>	<p style="text-align: right;">72</p> <p>1 A. That is at our current residence at 2648</p> <p>2 State Road 64.</p> <p>3 Q. Is that claim in process?</p> <p>4 A. No.</p> <p>11:03:26 5 Q. Was it paid?</p> <p>6 A. Yes.</p> <p>7 Q. Any other homeowners claims?</p> <p>8 A. I think that's the extent of them.</p> <p>9 Q. At this time have we discussed all insurance</p> <p>11:03:54 10 claims you've made to your insurance company</p> <p>11 throughout your lifetime?</p> <p>12 A. As far as I can recall.</p> <p>13 Q. Have you ever made claims against somebody</p> <p>14 else's insurance?</p> <p>11:04:19 15 A. I don't think so.</p> <p>16 Q. Has anybody ever made claims against you or</p> <p>17 your insurance?</p> <p>18 A. Not that I can recall.</p> <p>19 Q. At this time, have we discussed all insurance</p> <p>11:05:08 20 claims that you have been a part of either</p> <p>21 for or against in your lifetime?</p> <p>22 A. I believe we have.</p> <p>23 Q. Okay. Why don't we take a five-minute break?</p> <p>24 (At this time a recess was taken.)</p> <p>11:16:00 25 MR. ANDERSON: My client recalls</p>

<p style="text-align: right;">73</p> <p>1 additional claims.</p> <p>2 THE WITNESS: Right. There is an</p> <p>3 additional claim you need to be aware of.</p> <p>4 MS. WEBER: Okay.</p> <p>11:16:11 5 THE WITNESS: In 2019, my storage</p> <p>6 shed was broken into and I was robbed.</p> <p>7 BY MS. WEBER:</p> <p>8 Q. What policy was that under?</p> <p>9 A. That was under Acuity Insurance policy.</p> <p>11:16:30 10 Q. What was that location's address?</p> <p>11 A. That was 1273 250th, Glenwood City,</p> <p>12 Wisconsin.</p> <p>13 Q. And what type of Acuity Insurance policy was</p> <p>14 this?</p> <p>11:16:46 15 A. It would have been a homeowners insurance,</p> <p>16 but it was for a building.</p> <p>17 Q. Did you work with your agent or directly</p> <p>18 through Acuity?</p> <p>19 A. With an agent.</p> <p>11:17:06 20 Q. Who was the agent?</p> <p>21 A. That was Al Duchnowski.</p> <p>22 Q. How did you communicate with Al?</p> <p>23 A. By telephone.</p> <p>24 Q. Directly with him or one of his staff?</p> <p>11:17:29 25 A. Directly with him.</p>	<p style="text-align: right;">75</p> <p>1 after that, 2015.</p> <p>2 Q. We're going to talk -- besides homeowners,</p> <p>3 auto insurance, and business insurance, do</p> <p>4 you have any other policies with State Farm?</p> <p>11:19:55 5 MR. ANDERSON: At present, Counsel?</p> <p>6 MS. WEBER: Oh, I'm sorry, at any</p> <p>7 time.</p> <p>8 THE WITNESS: I think it was just,</p> <p>9 perhaps, that umbrella policy.</p> <p>10 BY MS. WEBER:</p> <p>11 Q. Umbrella, correct.</p> <p>12 How did you pay your State Farm</p> <p>13 premiums?</p> <p>14 A. By check.</p> <p>11:20:12 15 Q. How frequently did you pay your State Farm</p> <p>16 homeowners insurance?</p> <p>17 A. I believe the homeowners was paid</p> <p>18 semiannually.</p> <p>19 Q. How about your auto insurance, your State</p> <p>11:20:31 20 Farm auto insurance?</p> <p>21 A. They were paid monthly.</p> <p>22 Q. Also by check?</p> <p>23 A. Yes.</p> <p>24 Q. And the State Farm business insurance, how</p> <p>11:20:42 25 frequently was that paid?</p>
<p style="text-align: right;">74</p> <p>1 Q. Was that claim paid?</p> <p>2 A. Yes.</p> <p>3 Q. This policy you had with Acuity on the</p> <p>4 storage shed, when did you obtain that</p> <p>11:17:51 5 policy?</p> <p>6 A. 2016.</p> <p>7 Q. Have you ever had any other claims against</p> <p>8 that policy?</p> <p>9 A. No.</p> <p>11:18:11 10 Q. Prior to Auto-Owners, you said you had State</p> <p>11 Farm insurance as your homeowners insurer,</p> <p>12 when did you obtain that State Farm policy?</p> <p>13 A. I believe State Farm came onboard in the 2014</p> <p>14 range.</p> <p>11:18:59 15 Q. Who insured your home prior to that?</p> <p>16 A. I think prior to State Farm, it was Rural</p> <p>17 Mutual.</p> <p>18 Q. And prior to Auto-Owners on your auto policy,</p> <p>19 you said you had State Farm, when did you</p> <p>11:19:29 20 procure that State Farm policy?</p> <p>21 A. I believe they were all procured at about the</p> <p>22 same time, 2014.</p> <p>23 Q. Does that include the business policy we're</p> <p>24 here to talk about today?</p> <p>11:19:40 25 A. I think the business policy came just shortly</p>	<p style="text-align: right;">76</p> <p>1 A. Twice a year.</p> <p>2 Q. And was that also paid by check?</p> <p>3 A. Yes.</p> <p>4 Q. Have you ever had an insurance claim denied?</p> <p>11:21:04 5 A. No.</p> <p>6 Q. What properties do you currently own?</p> <p>7 A. I'm sorry?</p> <p>8 Q. What properties do you currently own?</p> <p>9 A. What properties. I currently own my</p> <p>11:21:34 10 residence at 2648 State Road 64. I currently</p> <p>11 own a lake home in Luck, Wisconsin. And I</p> <p>12 currently own a lake home in Chetek,</p> <p>13 Wisconsin.</p> <p>14 Q. When did you purchase your residence at State</p> <p>11:22:09 15 64?</p> <p>16 A. In December of 2015.</p> <p>17 Q. What was the purchase price?</p> <p>18 A. 297,000.</p> <p>19 Q. What was the list price?</p> <p>11:22:26 20 A. 300,000.</p> <p>21 MR. ANDERSON: I'm sorry, Counsel,</p> <p>22 I missed that. Are you talking about the</p> <p>23 lake home right now? I apologize.</p> <p>24 MS. WEBER: No. The State 64</p> <p>11:22:40 25 location. The current residence.</p>

<p style="text-align: right;">77</p> <p>1 BY MS. WEBER:</p> <p>2 Q. Did you finance that purchase?</p> <p>3 A. No.</p> <p>4 Q. Have you always used that as your primary residence since the purchase?</p> <p>11:22:58 5 A. Yes.</p> <p>7 Q. Have you ever put that property up for sale?</p> <p>8 A. No.</p> <p>9 Q. Are there any judgments or liens against that property?</p> <p>11:23:25 10 A. No.</p> <p>12 Q. Your lake home in Luck, Wisconsin, when did you purchase that property?</p> <p>13 A. Approximately, 2002.</p> <p>11:23:46 15 Q. What was the purchase price?</p> <p>16 A. 198,000.</p> <p>17 Q. Do you know the list price?</p> <p>18 A. 198,000.</p> <p>19 Q. How do you currently use that property?</p> <p>11:24:08 20 A. We basically use it very seldom, because it's just barely being brought back to a total remodel.</p> <p>21 Q. When you purchased that property, did you take out a mortgage?</p> <p>22 A. No.</p> <p>11:24:29 25 A. No.</p>	<p style="text-align: right;">79</p> <p>1 believe.</p> <p>2 Q. Who insured it prior to that?</p> <p>3 A. It was not insured prior to that.</p> <p>4 Q. Chetek, am I saying that correctly?</p> <p>11:26:23 5 A. Yes.</p> <p>6 Q. Your Chetek lake home, when did you purchase that?</p> <p>7 A. Approximately, 2000.</p> <p>9 Q. How much did you purchase it for?</p> <p>11:26:38 10 A. 82,5.</p> <p>11 Q. What was the list price?</p> <p>12 A. 125.</p> <p>13 Q. How do you use that property?</p> <p>14 A. This is our go-to place when we want to get away.</p> <p>11:26:50 15 Q. Fair to call it a cabin?</p> <p>16 A. That's being generous.</p> <p>18 Q. When you purchased that property, how did you pay for it?</p> <p>19 A. Cash.</p> <p>11:27:11 20 Q. Have you ever put the property up for sale?</p> <p>21 A. Yes.</p> <p>23 Q. When?</p> <p>24 A. Qualify. No. I was approached by a person who asked if he could purchase it. And I</p> <p>11:27:40 25</p>
<p style="text-align: right;">78</p> <p>1 Q. How did you pay for it?</p> <p>2 A. Cash.</p> <p>3 Q. You said you're currently remodeling it?</p> <p>4 A. Yes.</p> <p>11:24:51 5 Q. How are you financing the remodel?</p> <p>6 A. It's not being financed.</p> <p>7 Q. Just cash?</p> <p>8 A. Yes.</p> <p>9 Q. Have you ever put that property up for sale?</p> <p>11:25:01 10 A. No.</p> <p>11 Q. Are there any judgements or liens against that property?</p> <p>12 A. No.</p> <p>13 Q. Is that property currently insured.</p> <p>11:25:14 15 A. Yes.</p> <p>16 Q. Who is it insured through?</p> <p>17 A. Auto-Owners.</p> <p>18 Q. Under what policy?</p> <p>19 A. Its own policy.</p> <p>11:25:22 20 Q. Is it a homeowners policy?</p> <p>21 A. Yes.</p> <p>22 Q. What are the limits on that policy?</p> <p>23 A. I do not know what the limits are.</p> <p>24 Q. When did you procure that policy?</p> <p>11:25:39 25 A. The current policy was taken out in 2019, I</p>	<p style="text-align: right;">80</p> <p>1 said yes, he could.</p> <p>2 Q. And what happened to that deal?</p> <p>3 A. It got spoiled by too much attorney involvement.</p> <p>4 Q. I don't know that that's a thing?</p> <p>11:28:03 5 MR. ANDERSON: I don't know that it's not a thing.</p> <p>6 BY MS. WEBER:</p> <p>7 Q. When did he approach you about that sale?</p> <p>11:28:19 10 A. 2004.</p> <p>11 Q. And you've not put it up for sale since then?</p> <p>12 A. No.</p> <p>13 Q. Is that property currently insured?</p> <p>14 A. Yes.</p> <p>11:28:41 15 Q. Who is it insured through?</p> <p>16 A. That's Auto-Owners.</p> <p>17 Q. And is it on its own policy?</p> <p>18 A. No.</p> <p>19 Q. What policy is it under?</p> <p>11:28:55 20 A. It's an extension of our homeowners.</p> <p>21 Q. Do you know the policy limits on your homeowners policy?</p> <p>22 A. I do, but I don't know what they are.</p> <p>23 Q. Your State Farm one, I apologize. The State Farm policy you had prior to your current</p> <p>11:29:10 25</p>

<p style="text-align: right;">81</p> <p>1 Auto-Owners policy on your home?</p> <p>2 A. Yes.</p> <p>3 Q. Do you know the limits on that?</p> <p>4 A. No, I do not.</p> <p>11:29:18 5 MR. ANDERSON: And your question</p> <p>6 was about the Highway 64 home?</p> <p>7 MS. WEBER: Yes.</p> <p>8 BY MS. WEBER:</p> <p>9 Q. Any other properties you currently own that</p> <p>11:29:31 10 we have not discussed?</p> <p>11 A. No.</p> <p>12 Q. Have you sold any property in the last ten</p> <p>13 years?</p> <p>14 A. Yes.</p> <p>11:29:38 15 Q. What properties have you sold in the last ten</p> <p>16 years?</p> <p>17 A. I sold my residence at 1253 250th Street.</p> <p>18 Q. Is that it?</p> <p>19 A. No.</p> <p>11:30:02 20 Q. Continue.</p> <p>21 A. I sold my pole shed at 1273 250th Street.</p> <p>22 Q. Any others?</p> <p>23 A. And I sold the vacant shell of the Cubby Hole</p> <p>24 at 105 River Street.</p> <p>11:30:25 25 Q. Any other property you've sold in the past</p>	<p style="text-align: right;">83</p> <p>1 that that mortgage has been paid off?</p> <p>2 A. It was paid off long before we sold the</p> <p>3 property.</p> <p>4 Q. When was it paid off?</p> <p>11:33:12 5 A. That I do not remember.</p> <p>6 Q. Did you ever miss a payment on that mortgage?</p> <p>7 A. I don't think so.</p> <p>8 Q. And did that mortgage ever go into</p> <p>9 foreclosure?</p> <p>11:33:25 10 A. No.</p> <p>11 Q. You built on that in 2003, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Did you finance that build?</p> <p>14 A. Yes.</p> <p>11:33:43 15 Q. Who was that financed through?</p> <p>16 A. That was through First Federal as well.</p> <p>17 Q. How much was it financed for?</p> <p>18 A. I think we took a \$250,000 note out on that.</p> <p>19 Q. And, again, because you've sold the property,</p> <p>11:34:10 20 I assume that that's been paid off?</p> <p>21 A. Yes.</p> <p>22 Q. When was that paid off?</p> <p>23 A. Close but not for sure, about, 2011.</p> <p>24 Q. Did you ever miss a payment on that note?</p> <p>11:34:33 25 A. No.</p>
<p style="text-align: right;">82</p> <p>1 ten years?</p> <p>2 A. No.</p> <p>3 Q. 1253 250th, that was a residence, correct?</p> <p>4 A. Yes.</p> <p>11:30:58 5 Q. When did you purchase that?</p> <p>6 A. We built that in 2003.</p> <p>7 Q. When did you purchase the land?</p> <p>8 A. In around 2000.</p> <p>9 Q. How much did you purchase the land for?</p> <p>11:31:20 10 A. 157,000.</p> <p>11 Q. What was the list price of the land?</p> <p>12 A. That was a portion of a larger chunk, so it</p> <p>13 was a negotiated price at that price.</p> <p>14 Q. Was that purchase financed?</p> <p>11:31:51 15 A. Yes.</p> <p>16 Q. Who was it financed through?</p> <p>17 A. The correct name is something Federal.</p> <p>18 They're out of Hudson, but they've got a</p> <p>19 Baldwin branch. First Federal, I believe.</p> <p>11:32:27 20 Q. That sounds right. How much was it mortgaged</p> <p>21 for?</p> <p>22 A. The exact number is I do not know, but I'm</p> <p>23 assuming it would have required about a</p> <p>24 20 percent down.</p> <p>11:32:58 25 Q. Since you've sold that property, I assume</p>	<p style="text-align: right;">84</p> <p>1 Q. And that note was never foreclosed, correct?</p> <p>2 A. No.</p> <p>3 Q. When did you sell the residence?</p> <p>4 A. In December of 2014.</p> <p>11:34:51 5 Q. When you bought it in 2000, did you have</p> <p>6 insurance on it?</p> <p>7 A. It was bare land, so no.</p> <p>8 Q. Did you ever have insurance on it?</p> <p>9 A. On the premises?</p> <p>11:35:18 10 Q. Yes.</p> <p>11 A. Yes.</p> <p>12 Q. When did you obtain your first policy for</p> <p>13 1253 250th?</p> <p>14 A. It would have been through the construction</p> <p>11:35:28 15 process in 2003.</p> <p>16 Q. Do you know who that policy was through?</p> <p>17 A. The very first one was I think through Kado &</p> <p>18 Associates.</p> <p>19 Q. Do you know what type of policy that was?</p> <p>11:35:45 20 A. Homeowners.</p> <p>21 Q. And how long did you have that policy?</p> <p>22 A. I would say three years.</p> <p>23 Q. Who insured it after Kado & Associates?</p> <p>24 A. I believe it went through the progression to</p> <p>11:36:21 25 Rural Mutual.</p>

<p style="text-align: right;">85</p> <p>1 Q. Same agent as your delivery company for Rural Mutual?</p> <p>2 A. Yes.</p> <p>3 Q. Who did you switch to after Rural Mutual?</p> <p>11:36:56 5 A. I think we had him until it was sold.</p> <p>6 Q. When did it sell?</p> <p>7 A. In December of 2014.</p> <p>8 Q. Oh, right, I'm sorry. Okay. When you built the structure on that property in 2003, did you have a general contractor?</p> <p>11:37:35 10 A. Yes.</p> <p>12 Q. Did that contractor purchase the insurance during the build or did you?</p> <p>13 A. He provided his own insurance up through a point in the construction and then I provided it after that.</p> <p>11:37:56 15 Q. And was this the homeowners policy or a different policy?</p> <p>16 A. I think it was a construction -- I think it was actually called a construction policy.</p> <p>11:38:07 20 Q. And how long do you think you had that construction policy?</p> <p>21 A. Until 2004.</p> <p>22 Q. So roughly 2003 to 2004?</p> <p>11:38:25 25 A. Right.</p>	<p style="text-align: right;">87</p> <p>1 A. No.</p> <p>2 Q. The parcel that you retained from the December 2014 sale of the 1253 250th Street property, how long did you retain that parcel?</p> <p>11:41:01 5 A. Seven years.</p> <p>6 Q. So you sold it roughly 2020? No, 2021?</p> <p>7 A. Yes.</p> <p>8 Q. Math, it's not my strong suit. Did you change that property at all between 2014 and 2021?</p> <p>11:41:27 10 A. Please explain.</p> <p>11 Q. Did you build anything on it or make any improvements to the land at all?</p> <p>12 A. No.</p> <p>11:41:42 15 Q. Did you keep any insurance on that property after the sale of the parcel with the residence in 2014?</p> <p>16 A. Yes.</p> <p>17 Q. What insurance did you have on that?</p> <p>11:41:56 20 A. Up until we sold, it was Auto-Owners.</p> <p>21 Q. Did you have that Auto-Owners policy on it in 2014?</p> <p>22 A. No.</p> <p>23 Q. When did you get that Auto-Owners policy?</p> <p>11:42:12 25</p>
<p style="text-align: right;">86</p> <p>1 Q. Did you ever have any judgments or liens besides the mortgage and note we discussed against the 1253 250th property.</p> <p>2 A. No.</p> <p>11:38:54 5 Q. How much did you sell the property for in December of 2014?</p> <p>6 A. 662,000.</p> <p>7 Q. What did you have it listed at?</p> <p>8 A. The 662,000 was a breakout of a larger parcel, so, again, that was a negotiated price.</p> <p>11:39:35 10 Q. Did you retain any of that parcel?</p> <p>11 A. Yes.</p> <p>12 Q. Do you currently own any of that parcel?</p> <p>11:39:52 15 A. No.</p> <p>16 Q. Did you list that property for sale?</p> <p>17 A. Yes.</p> <p>18 Q. And around December of 2014?</p> <p>19 A. Yes.</p> <p>11:40:12 20 Q. Do you know how long it was on the market?</p> <p>21 A. 30 days.</p> <p>22 Q. Who was your listing agent?</p> <p>23 A. Tammy DeGraw.</p> <p>24 Q. Had you ever listed the property prior to roughly November, December 2014?</p> <p>11:40:33 25</p>	<p style="text-align: right;">88</p> <p>1 A. Auto-Owners would have been put on that in about 2019.</p> <p>2 Q. Did you have that property insured prior to having the Auto-Owners policy on it in 2019?</p> <p>11:42:38 5 A. Yes.</p> <p>6 Q. Who was that insurance policy through?</p> <p>7 A. Acuity.</p> <p>8 Q. And when did you start insuring that property with Acuity?</p> <p>9 A. I believe in 2018.</p> <p>11:42:49 10 Q. Did you insure that property prior to 2018?</p> <p>11 A. Yes.</p> <p>12 Q. Who did you insure it through?</p> <p>13 A. I believe that was State Farm.</p> <p>11:43:13 15 Q. And when did you obtain a State Farm policy for that property?</p> <p>16 A. To be exact, I'm not sure, but I think I had it for three years.</p> <p>17 Q. Did you have this insurance policy on this property prior to State Farm after you sold the residence?</p> <p>11:43:36 20 A. Yes.</p> <p>21 Q. Who was that through?</p> <p>22 A. That would have been the -- I'm pretty sure that would have been the State Farm period.</p> <p>11:43:54 25</p>

<p style="text-align: right;">89</p> <p>1 Q. So State Farm was the first insurance policy</p> <p>2 you had on that property after the sale of</p> <p>3 the residence?</p> <p>4 A. I believe so.</p> <p>11:44:05 5 Q. What type of State Farm policy was that?</p> <p>6 A. I guess it's not a homeowners, so it would be</p> <p>7 specifically for that building.</p> <p>8 Q. For the building on the parcel, the 1253</p> <p>9 250th parcel?</p> <p>11:44:20 10 A. The 273 250th parcel.</p> <p>11 Q. Oh, no, we're still on 1253 250th. Or is the</p> <p>12 parcel -- let me clarify. Try this again.</p> <p>13 The parcel that you retained after</p> <p>14 you sold the residence at 1253 250, is the</p> <p>11:44:39 15 that 1273 250th location?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. That makes things a lot clearer.</p> <p>18 A. Okay.</p> <p>19 Q. So when you split the properties, the 1273</p> <p>11:45:07 20 and the 1253, was the building on the</p> <p>21 property at that time?</p> <p>22 A. Yes.</p> <p>23 Q. And that is the pole shed we discussed</p> <p>24 earlier?</p> <p>11:45:28 25 A. Yes.</p>	<p style="text-align: right;">91</p> <p>1 A. No.</p> <p>2 Q. Did that mortgage ever go into foreclosure?</p> <p>3 A. No.</p> <p>4 Q. When did you sell that property?</p> <p>11:48:23 5 A. August 16, 2021.</p> <p>6 Q. How much did you sell it for?</p> <p>7 A. 125,000.</p> <p>8 Q. Have you ever listed that property for sale?</p> <p>9 A. Yes.</p> <p>11:48:49 10 Q. When was the first time you listed that</p> <p>11 property for sale?</p> <p>12 A. I believe the first time it was listed would</p> <p>13 have been 2015.</p> <p>14 Q. Who was the listing agent on that?</p> <p>11:49:07 15 A. Tammy DeGraw.</p> <p>16 Q. What was the list price?</p> <p>17 A. I believe it was 489,000.</p> <p>18 Q. Did you get any offers on it?</p> <p>19 A. No.</p> <p>11:49:23 20 Q. How long did you have it listed?</p> <p>21 A. She would have run her one-year contract.</p> <p>22 Q. Did you list it for sale any time after that?</p> <p>23 A. Yes.</p> <p>24 Q. When?</p> <p>11:49:40 25 A. There was a lag in there, so it probably</p>
<p style="text-align: right;">90</p> <p>1 Q. When did you list that for sale?</p> <p>2 A. It wasn't listed when it sold.</p> <p>3 Q. Did somebody approach you about it?</p> <p>4 A. Yes.</p> <p>11:45:52 5 Q. How much did you sell it for?</p> <p>6 A. 325,000.</p> <p>7 Q. Had you had it listed prior to that?</p> <p>8 A. When it was for sale with the house was the</p> <p>9 only time.</p> <p>11:46:15 10 Q. Okay. Let's move on to 105 River Street.</p> <p>11 When did you purchase that</p> <p>12 property?</p> <p>13 A. That would have been around 2000.</p> <p>14 Q. How much did you purchase it for?</p> <p>11:47:24 15 A. 75,000.</p> <p>16 Q. What was the list price?</p> <p>17 A. 75,000.</p> <p>18 Q. Did you mortgage the property at that time?</p> <p>19 A. Yes.</p> <p>11:47:39 20 Q. Who was the mortgage through?</p> <p>21 A. It was a land contract through Walter Nelson.</p> <p>22 Q. When was that paid off?</p> <p>23 A. We probably paid that off within less than a</p> <p>24 year.</p> <p>11:47:59 25 Q. Did you ever miss a payment on that mortgage?</p>	<p style="text-align: right;">92</p> <p>1 would have been about 2016.</p> <p>2 Q. Who did you list it with?</p> <p>3 A. Home & Country Realty.</p> <p>4 Q. Did you have any specific realtors associated</p> <p>11:50:03 5 with it?</p> <p>6 A. Yes.</p> <p>7 Q. Who was that?</p> <p>8 A. Larry Albrightson.</p> <p>9 Q. Would you spell that for the court reporter?</p> <p>11:50:17 10 A. A-L-B-R-I -G-H-T-S-O-N.</p> <p>11 Q. What was the list price on it at that time?</p> <p>12 A. I believe it was the same price of 489.</p> <p>13 Q. Did you have any offers on it?</p> <p>14 A. No.</p> <p>11:50:34 15 Q. How long was it up for sale that time?</p> <p>16 A. He would have run his one year listing</p> <p>17 contract as well.</p> <p>18 Q. At any time in 2015, when it was listed with</p> <p>19 Tammy DeGraw, did you reduce the asking</p> <p>11:50:50 20 price?</p> <p>21 A. No.</p> <p>22 Q. At any time in 2016, when it was listed with</p> <p>23 Home & Country, did you reduce the listing</p> <p>24 price?</p> <p>11:50:57 25 A. No.</p>

<p style="text-align: right;">93</p> <p>1 Q. Have you listed it for sale any other time?</p> <p>2 A. No.</p> <p>3 Q. Did you list it for sale before it was sold</p> <p>4 in 2021?</p> <p>11:51:08 5 A. No.</p> <p>6 Q. Did somebody approach you about that sale?</p> <p>7 A. Yes.</p> <p>8 Q. Who did you sell it to?</p> <p>9 A. I believe his name is Nolan Sell.</p> <p>11:51:43 10 Q. Can you spell Sell for us?</p> <p>11 A. I believe it's S-E-L-L.</p> <p>12 Q. What was that property like when you bought</p> <p>13 it?</p> <p>14 A. Very dilapidated.</p> <p>11:52:18 15 Q. Were there any structures on it?</p> <p>16 A. Yes.</p> <p>17 Q. How many structures?</p> <p>18 A. One.</p> <p>19 Q. What was that structure?</p> <p>11:52:28 20 A. It was the remnants of an old lumberyard.</p> <p>21 Q. Can you describe the building for us?</p> <p>22 A. The footprint was probably 54 by 90. It had</p> <p>23 a 20 by 20 attachment to it in the front. I</p> <p>24 believe it had 14-foot sidewalls. Half of</p> <p>11:53:00 25 the interior of the building in the lumber</p>	<p style="text-align: right;">95</p> <p>1 paint, new ceiling, new lighting.</p> <p>2 Q. And what portion of the lumberyard building</p> <p>3 did the salon encompass?</p> <p>4 A. It was a portion -- it was all of the 20 by</p> <p>11:55:25 5 20 addition with just a little bit of</p> <p>6 overflow into the main 50 by 90 footprint.</p> <p>7 Q. Had that previously been the office or the</p> <p>8 sales center or what the lumber area?</p> <p>9 A. It was probably considered an office or a</p> <p>11:55:50 10 sales counter area is more descript.</p> <p>11 Q. When did you make those changes?</p> <p>12 A. As soon as we purchased the building in 2000.</p> <p>13 Q. Did the rest of the building remain the same?</p> <p>14 A. Yes.</p> <p>11:56:15 15 Q. Did you finance those changes?</p> <p>16 A. Yes.</p> <p>17 Q. Who did you finance through?</p> <p>18 A. Wisconsin Credit Union.</p> <p>19 Q. What was the finance amount?</p> <p>11:56:26 20 A. I believe it was 125,000 for the remodel.</p> <p>21 Q. And has that been paid off?</p> <p>22 A. Yes.</p> <p>23 Q. When was that paid off?</p> <p>24 A. That would have been paid off in probably</p> <p>11:56:49 25 2005.</p>
<p style="text-align: right;">94</p> <p>1 portion was office up front with</p> <p>2 merchandising sales in the back, and the west</p> <p>3 half was all storage for lumber. It had a</p> <p>4 drive-through for trucks from front to back.</p> <p>11:53:27 5 Q. Why did you purchase this property?</p> <p>6 A. We purchased that property specifically to</p> <p>7 give my wife a new location for her beauty</p> <p>8 salon.</p> <p>9 Q. You previously described the property in</p> <p>11:54:03 10 dilapidated condition when you purchased it.</p> <p>11 Did you make any modifications to the</p> <p>12 building so your wife could have her salon?</p> <p>13 A. Yes.</p> <p>14 Q. What modifications did you make?</p> <p>11:54:18 15 A. The first thing it got was a brand new roof.</p> <p>16 The second thing it got was the exterior</p> <p>17 sheet metal that was there that looked</p> <p>18 terrible was torn off, and the siding that</p> <p>19 was underneath it was nice Cedar, so that was</p> <p>11:54:38 20 stripped and repainted.</p> <p>21 Her front area where she was going</p> <p>22 to run her shop out of got new windows and</p> <p>23 doors. Her shop area got new flooring as</p> <p>24 well as new plumbing for a bathroom and</p> <p>11:55:01 25 dispensary, which the salon people need. New</p>	<p style="text-align: right;">96</p> <p>1 Q. Did you ever miss any payments on that?</p> <p>2 A. No.</p> <p>3 Q. And that never went into foreclosure?</p> <p>4 A. No.</p> <p>11:56:59 5 Q. Did you ever make any other improvements to</p> <p>6 the property?</p> <p>7 A. Yes.</p> <p>8 Q. What other improvements did you make?</p> <p>9 A. The entire rest of the building was</p> <p>11:57:42 10 remodeled.</p> <p>11 Q. When was that done?</p> <p>12 A. I believe the project started in 2006.</p> <p>13 Q. Was that financed?</p> <p>14 A. Yes.</p> <p>11:57:59 15 Q. Who was that financed through?</p> <p>16 A. That was financed through Wisconsin Credit</p> <p>17 Union.</p> <p>18 Q. How much was it financed for?</p> <p>19 A. Our original note was 250,000.</p> <p>11:58:12 20 Q. Did you take out any additional?</p> <p>21 A. No.</p> <p>22 Q. Has that been paid off?</p> <p>23 A. Yes.</p> <p>24 Q. When was that paid off?</p> <p>11:58:23 25 A. That was paid off in approximately 2015.</p>

<p style="text-align: right;">97</p> <p>1 Q. What changes were made?</p> <p>2 A. Everything. The lumberyard portion for</p> <p>3 storage was completely torn out. There were</p> <p>4 new beams put in for roof support. The</p> <p>11:59:02 5 drive-through area was completely concreted</p> <p>6 with in-floor heat. The east side, which was</p> <p>7 the normal product storage for paints and</p> <p>8 things got a new floor, got a new ceiling.</p> <p>9 The entire structure was spray-foamed</p> <p>11:59:27 10 insulated. It got a suspended ceiling, new</p> <p>11 lighting, new plumbing, new electrical, new</p> <p>12 windows, new doors, an ADA ramp, custom</p> <p>13 cabinets, new bathrooms, in-floor heat.</p> <p>14 Everything.</p> <p>11:59:50 15 Q. When were these modifications completed?</p> <p>16 A. We were open for business in May of 2007, so</p> <p>17 just prior to.</p> <p>18 Q. During this remodel of the building, was</p> <p>19 anything done in the beauty salon?</p> <p>12:00:07 20 A. No.</p> <p>21 Q. So in May of 2007, the entire original</p> <p>22 structure at 105 River Street had been</p> <p>23 remodeled?</p> <p>24 A. Looked like a new brand new building.</p> <p>12:00:26 25 Q. Can you give us an idea of what that building</p>	<p style="text-align: right;">99</p> <p>1 with the application once and for all.</p> <p>2 Q. Absolutely. Did this woman who approached</p> <p>3 you about the dance studio, did she lease the</p> <p>4 space after it was completed?</p> <p>12:02:28 5 A. Yes, she did.</p> <p>6 Q. What was her name.</p> <p>7 A. Her name was Jacquile Wakeen.</p> <p>8 Q. Could you spell both of those names for us?</p> <p>9 A. I believe it's Jacquile, J-A-C-Q-U-I -L-E, and</p> <p>12:02:49 10 Wakeen is W-A-K-E-E-N.</p> <p>11 Q. Thank you. How long did Jacqueline lease the</p> <p>12 space?</p> <p>13 A. She leased it from 2007 until I think 2015.</p> <p>14 Q. Did anybody lease the space after her?</p> <p>12:03:14 15 A. Yes.</p> <p>16 Q. Who leased the space after Jacqueline?</p> <p>17 A. It was one of her students, which her name is</p> <p>18 Britta Katlik.</p> <p>19 Q. Could you spell both of those names for us?</p> <p>12:03:26 20 A. Britta is B-R-I-T-T-A. And Katlik is</p> <p>21 K-A-T-L-I-K.</p> <p>22 Q. How long did Britta lease the space?</p> <p>23 A. I believe Britta was in there until 2017.</p> <p>24 Q. Why did Jacqueline cease to lease the dance</p> <p>12:03:49 25 studio.</p>
<p style="text-align: right;">98</p> <p>1 encompassed after the remodels in 2007?</p> <p>2 A. In 2007, it encompassed the beauty salon,</p> <p>3 which was originally there. It encompassed</p> <p>4 about 1100 square feet of a dance studio,</p> <p>12:00:46 5 which sparked the total rebuild. And it</p> <p>6 encompassed the most biggest portion of the</p> <p>7 building which was going to be the bar area.</p> <p>8 Q. You said the dance studio sparked the</p> <p>9 improvement in 2006, 2007, how did that come</p> <p>12:01:17 10 about?</p> <p>11 A. A local gal who had run a dance studio for</p> <p>12 many years was losing her leased space, so</p> <p>13 she approached me and asked if I would</p> <p>14 consider building her a dance studio that she</p> <p>12:01:35 15 could lease. And I said definitely.</p> <p>16 So in order to do that, because of</p> <p>17 the change in purpose, we had to make</p> <p>18 application to the state for state-approved</p> <p>19 plans. And instead of going through that</p> <p>12:01:55 20 process multiple times, Dayna and I discussed</p> <p>21 what we should do with the rest of the</p> <p>22 building. That's when we -- because I had</p> <p>23 run a bar and restaurant before, I said lets</p> <p>24 do the entire building, dance studio, plus</p> <p>12:02:10 25 bar and restaurant space and then we're done</p>	<p style="text-align: right;">100</p> <p>1 A. She got married and pregnant and moved away.</p> <p>2 Q. Why did Britta cease to lease the dance</p> <p>3 studio?</p> <p>4 A. She got married and moved away.</p> <p>12:04:04 5 Q. Did either Jacqueline or Britta have any</p> <p>6 issues making their lease payments?</p> <p>7 A. None.</p> <p>8 Q. Have you ever had any appraisals on the 105</p> <p>9 River Street location?</p> <p>12:04:46 10 A. Yes.</p> <p>11 Q. How many have you had done?</p> <p>12 A. I believe two.</p> <p>13 Q. When was the first one?</p> <p>14 A. The first one would have been prior to our</p> <p>12:04:58 15 first remodel for Dayna's shop, which would</p> <p>16 have been in that 2000 range.</p> <p>17 Q. Do you have a copy of that appraisal?</p> <p>18 A. Yes.</p> <p>19 Q. Can we please get a copy of that appraisal?</p> <p>12:05:14 20 MR. ANDERSON: Sure. We can talk</p> <p>21 about where it is.</p> <p>22 THE WITNESS: It's been supplied so</p> <p>23 many places, but this is a different firm.</p> <p>24 We can get you a copy.</p> <p>12:05:26 25 MR. ANDERSON: We'll work on it.</p>

<p style="text-align: right;">101</p> <p>1 BY MS. WEBER:</p> <p>2 Q. When was the second time it was appraised?</p> <p>3 A. I believe that was in our second portion of</p> <p>4 the remodel in that 2006 range.</p> <p>12:05:40 5 Q. On both of these appraisals, did the banks</p> <p>6 require them to be appraised?</p> <p>7 A. Yes.</p> <p>8 Q. Who conducted the appraisals?</p> <p>9 A. The first one I know was Brian Ducklow.</p> <p>12:05:57 10 Q. Do you know the other one?</p> <p>11 A. I'm thinking it might have been him, but I</p> <p>12 can't guarantee that.</p> <p>13 Q. go ahead and take a look at that document for</p> <p>14 me. Do you recognize this document?</p> <p>12:07:17 15 A. Yes.</p> <p>16 Q. What is it?</p> <p>17 A. This is an appraisal of the building.</p> <p>18 MS. WEBER: And go ahead and mark</p> <p>19 this as Exhibit 2.</p> <p>20 (Deposition Exhibit 2 was marked</p> <p>21 for identification.)</p> <p>22 BY MS. WEBER:</p> <p>23 Q. When was this appraisal conducted?</p> <p>24 A. It says here May 5th of 2006.</p> <p>12:07:36 25 Q. So this would have been the appraisal for the</p>	<p style="text-align: right;">103</p> <p>1 that for us?</p> <p>2 A. I believe the first box that's shadowed is as</p> <p>3 is as of May 5, 2006, 150,000. And the</p> <p>4 second shadow is subject to planned</p> <p>12:09:50 5 remodeling and stabilized occupant,</p> <p>6 occupancy, \$380,000.</p> <p>7 Q. Is it your understanding that in 2006, via</p> <p>8 this appraisal, the property appraised for</p> <p>9 \$150,000 as is and \$380,000 subject to the</p> <p>12:10:17 10 planned remodeling and stabilized occupancy?</p> <p>11 A. That would be my understanding.</p> <p>12 Q. Can you flip to the page numbered, at the</p> <p>13 bottom, 11, for me?</p> <p>14 A. Yes.</p> <p>12:10:55 15 Q. The fourth box up from the bottom says</p> <p>16 Interior Finish. And then there's a</p> <p>17 description in the second column. Can you</p> <p>18 please read that description, to yourself is</p> <p>19 fine?</p> <p>12:11:10 20 A. To myself?</p> <p>21 Q. Yes. Go ahead. Let me know when you're</p> <p>22 finished.</p> <p>23 A. I'm finished.</p> <p>24 Q. Do you agree that the description there is</p> <p>12:11:38 25 referring to the planned remodels we've</p>
<p style="text-align: right;">102</p> <p>1 remodel for the dance studio, restaurant and</p> <p>2 bar?</p> <p>3 A. Yes.</p> <p>4 Q. Can you flip to, its numbered page 3? I</p> <p>12:08:19 5 think it's actually the fourth page for me.</p> <p>6 A. Yes.</p> <p>7 Q. At the top of the first page, the first</p> <p>8 paragraph there are four bullet points. The</p> <p>9 fourth bullet points says "receipt and</p> <p>12:08:40 10 analysis of information on the property from</p> <p>11 the owner." Do you see where I'm reading</p> <p>12 there?</p> <p>13 A. Yes.</p> <p>14 Q. Did I read that correctly?</p> <p>12:08:47 15 A. Yes.</p> <p>16 Q. Do you know what information this is</p> <p>17 referring to, the information from the</p> <p>18 property owner?</p> <p>19 A. No, I do not.</p> <p>12:09:06 20 Q. Can you flip back to the page numbered 1? I</p> <p>21 think it's two pages prior.</p> <p>22 A. Yes.</p> <p>23 Q. I realize this isn't a great copy, but if you</p> <p>24 can read what is in the first two boxes there</p> <p>12:09:31 25 in the center of the page. Would you read</p>	<p style="text-align: right;">104</p> <p>1 discussed in 2006?</p> <p>2 A. I do.</p> <p>3 Q. And that remodel came to fruition, correct?</p> <p>4 A. Yes.</p> <p>12:11:52 5 Q. That is all I have for this exhibit. And I</p> <p>6 think we are at a good place to take a break.</p> <p>7 A. I think that's good.</p> <p>8 (At this time a recess was taken.)</p> <p>9 BY MS. WEBER:</p> <p>13:18:45 10 Q. Mr. Grant, we came back after a short lunch</p> <p>11 break here. I want to ask you about the</p> <p>12 State Farm policy you had on 105 River</p> <p>13 Street. When did you purchase this policy?</p> <p>14 A. That policy was purchased I believe in</p> <p>13:19:08 15 January of 2015.</p> <p>16 Q. Did you purchase it through an agent?</p> <p>17 A. Yes.</p> <p>18 Q. What agent was that?</p> <p>19 A. The agent would have been Jennifer Rivard.</p> <p>13:19:21 20 Q. Can you spell her name, please?</p> <p>21 A. J-E-N-N-I-F-E-R. Rivard is R-I-V-A-R-D.</p> <p>22 Q. And how long was Jennifer Rivard your agent</p> <p>23 for that policy?</p> <p>24 A. She left the State Farm network not too long</p> <p>13:19:47 25 after that. Maybe it would probably be</p>

<p style="text-align: right;">105</p> <p>1 pushing a year, a year, I would say.</p> <p>2 Q. And then who became your agent?</p> <p>3 A. Well, it would have been the broker she</p> <p>4 worked out of, Chris LaMay.</p> <p>13:20:05 5 Q. Do you know what type of policy you purchased</p> <p>6 from State Farm?</p> <p>7 A. I believe it was a business policy.</p> <p>8 Q. Do you know if it was a specific type of</p> <p>9 business policy?</p> <p>13:20:29 10 A. No, I do not.</p> <p>11 MR. ANDERSON: Do you have the</p> <p>12 policy?</p> <p>13 (Deposition Exhibit 3 was marked</p> <p>14 for identification.)</p> <p>13:21:06 15 BY MS. WEBER:</p> <p>16 Q. Mr. Grant, I'm showing you what we have</p> <p>17 marked as Exhibit 3. Do you recognize this</p> <p>18 document?</p> <p>19 A. Yes, I do.</p> <p>13:21:16 20 Q. What is it?</p> <p>21 A. It is a State Farm Fire and Casualty Company</p> <p>22 renter's rate quote.</p> <p>23 Q. Is that your name under Prepared For?</p> <p>24 A. Yes, it is.</p> <p>13:21:32 25 Q. You mentioned this is a renters rate quote,</p>	<p style="text-align: right;">107</p> <p>1 Q. Is your name under Customers on this</p> <p>2 document?</p> <p>3 A. It is.</p> <p>4 Q. And what is the property location under</p> <p>5 Location Description?</p> <p>13:23:53 6 A. 1253 250th Street, Glenwood City, Wisconsin.</p> <p>7 Q. Actually the line just above that. It says</p> <p>8 Location Description, colon.</p> <p>9 MR. ANDERSON: The line above gives</p> <p>13:24:10 10 the names.</p> <p>11 BY MS. WEBER:</p> <p>12 Q. Oh, down to location details, sorry.</p> <p>13 A. Oh, location details.</p> <p>14 Q. Yes.</p> <p>13:24:18 15 A. Location description, 105 River Street,</p> <p>16 Woodville, Wisconsin.</p> <p>17 Q. And what is this titled at the top?</p> <p>18 A. Business Insurance Application.</p> <p>19 Q. And what is the number at the top on the</p> <p>20 right side?</p> <p>13:24:33 21 A. 99-BY-R [REDACTED]</p> <p>22 Q. And is this your State Farm insurance policy</p> <p>23 number?</p> <p>24 A. Can I review the other --</p> <p>13:24:50 25 MR. ANDERSON: No. She's asking</p>
<p style="text-align: right;">106</p> <p>1 correct?</p> <p>2 A. That's what it says on the sheet.</p> <p>3 Q. Is there a reason why you would be getting a</p> <p>4 renters rate quote?</p> <p>13:21:48 5 A. I believe the agent mentioned it was the same</p> <p>6 quote but under the renters rate it carried a</p> <p>7 different premium.</p> <p>8 Q. And this quote was for the 105 River Street</p> <p>9 location, correct?</p> <p>13:22:05 10 A. That's correct.</p> <p>11 Q. Did you end up purchasing this policy?</p> <p>12 A. That I cannot not say with certainty.</p> <p>13 MR. ANDERSON: Is this marked as</p> <p>14 Exhibit 3?</p> <p>13:22:33 15 MS. WEBER: Yes.</p> <p>16 (Deposition Exhibit Number 4 was</p> <p>17 marked for identification.)</p> <p>18 BY MS. WEBER:</p> <p>19 Q. Mr. Grant, I have just handed you a document</p> <p>13:22:48 20 that we've marked as Exhibit 4. Do you</p> <p>21 recognize this document?</p> <p>22 A. Not in its current form.</p> <p>23 Q. Have you seen a similar document with the</p> <p>24 same information?</p> <p>13:23:39 25 A. I'm going to have to say no.</p>	<p style="text-align: right;">108</p> <p>1 you from your memory.</p> <p>2 THE WITNESS: From memory, I do not</p> <p>3 know. I cannot recall.</p> <p>4 BY MS. WEBER:</p> <p>13:24:57 5 Q. Take your time, look through this document</p> <p>6 and let me know when you're finished.</p> <p>7 A. (Reviewing document.) I believe I'm</p> <p>8 finished.</p> <p>9 Q. Is the information in this application</p> <p>10 correct?</p> <p>13:26:19 11 A. I believe it is.</p> <p>12 MR. ANDERSON: I will object to</p> <p>13 that. He has already said he's not familiar</p> <p>14 with this policy, so he can't speak as to</p> <p>13:26:26 15 whether it's correct or not.</p> <p>16 BY MS. WEBER:</p> <p>17 Q. Is your information and information provided</p> <p>18 by you, such as the property description,</p> <p>19 your name, eligibility information --</p> <p>13:26:40 20 MR. ANDERSON: Objection as to</p> <p>21 form. You're asking him to guess at</p> <p>22 additional things based on your statements of</p> <p>23 such as. If you ask him specifically a name,</p> <p>24 he can answer that.</p> <p>25 BY MS. WEBER:</p>

<p style="text-align: right;">109</p> <p>1 Q. Is your name in this document, correct?</p> <p>2 A. Yes, it is.</p> <p>3 Q. Is your mailing address in this document,</p> <p>4 correct?</p> <p>13:26:58 5 A. Yes, it is.</p> <p>6 Q. There are two Social Security numbers listed?</p> <p>7 A. Yes.</p> <p>8</p> <p>9 MR. ANDERSON: Objection. They're</p> <p>13:27:08 10 not listed as the entire Social Security</p> <p>11 number.</p> <p>12 BY MS. WEBER:</p> <p>13 Q. They're the last four digits of two Social</p> <p>14 Security numbers listed, is one of those</p> <p>13:27:17 15 yours?</p> <p>16 A. Yes, it is.</p> <p>17 Q. Is it correct?</p> <p>18 A. It is.</p> <p>19 Q. Is the home phone number listed correct?</p> <p>13:27:27 20 A. At that time particular time, no.</p> <p>21 Q. It's not correct for the time?</p> <p>22 A. That's correct.</p> <p>23 Q. Is the business phone number correct?</p> <p>24 A. Yes.</p> <p>13:27:35 25 Q. Under location details, you were the owner</p>	<p style="text-align: right;">111</p> <p>1 correct at the time.</p> <p>2 MR. ANDERSON: Is there a question</p> <p>3 on that?</p> <p>4 MS. WEBER: Not yet. That was just</p> <p>13:29:11 5 clarification.</p> <p>6 BY MS. WEBER:</p> <p>7 Q. Next page, page 2. The top portion of that</p> <p>8 box is a continuation from the prior page.</p> <p>9 Is that information correct?</p> <p>13:29:53 10 A. The employees, which there was none. The</p> <p>11 personal vehicle use in the course of</p> <p>12 business would be yes for the only employee.</p> <p>13 Dayna, the owner.</p> <p>14 Q. But besides you and Dayna, there were no</p> <p>13:30:11 15 other employees --</p> <p>16 A. That's correct. So the information up to</p> <p>17 that point is correct.</p> <p>18 Q. I'm finished with this document.</p> <p>19 Who insured 105 River Street prior</p> <p>13:30:29 20 to State Farm?</p> <p>21 A. That I do not know for sure. I thought it</p> <p>22 was -- I thought it was Rural Mutual.</p> <p>23 Q. Do you have reason to believe it wasn't Rural</p> <p>24 Mutual?</p> <p>13:30:58 25 A. I see on the form it said Mount Morris, but I</p>
<p style="text-align: right;">110</p> <p>1 occupant of the property under described as</p> <p>2 Location Description in this document,</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>13:27:54 5 Q. And there was a type of business at this</p> <p>6 location, a beauty cosmetology hair salon; is</p> <p>7 that correct?</p> <p>8 A. Yes.</p> <p>9 Q. Under Location Details, are the details</p> <p>13:28:08 10 listed in that portion of this document</p> <p>11 correct for 105 River Street, Woodville,</p> <p>12 Wisconsin?</p> <p>13 A. Yes.</p> <p>14 Q. Under Adjustments, is that information</p> <p>13:28:21 15 correct for 105 River Street, Woodville,</p> <p>16 Wisconsin?</p> <p>17 A. Yes.</p> <p>18 Q. And under enclosed building, is that</p> <p>19 information correct for 105 River Street,</p> <p>20 Woodville, Wisconsin?</p> <p>21 A. Yes.</p> <p>22 Q. And I do want to make one clarifying</p> <p>23 question. The questions I ask you as relates</p> <p>24 to this document and their correctness are at</p> <p>13:28:58 25 the time, so, January 1, 2015, if they were</p>	<p style="text-align: right;">112</p> <p>1 don't know if that was a company he</p> <p>2 represented or not.</p> <p>3 Q. Do you know when the policy through Rural</p> <p>4 Mutual or Mount Morris would have been</p> <p>13:31:16 5 purchased for the 105 River Street?</p> <p>6 A. No, I do not.</p> <p>7 Q. Do you know what type of policy that would</p> <p>8 have been?</p> <p>9 A. No, I do not.</p> <p>13:31:29 10 Q. Do you know what the policy limits on that</p> <p>11 policy would have been?</p> <p>12 A. No, I do not.</p> <p>13 Q. Do you know if you ever made a claim under</p> <p>14 that policy?</p> <p>13:31:43 15 A. To my recollection, there's no claims made on</p> <p>16 that policy.</p> <p>17 Q. Why did you switch to State Farm?</p> <p>18 A. Insurance companies seem to follow the same</p> <p>19 practice, they get you in there customer base</p> <p>13:32:08 20 and then they continually eke up the</p> <p>21 premiums, so we used to go comparative</p> <p>22 shopping on occasion.</p> <p>23 Q. And that led you to State Farm?</p> <p>24 A. That led us to State Farm.</p> <p>13:32:23 25 Q. How often did you pay premiums under the</p>

<p style="text-align: right;">113</p> <p>1 State Farm policy for 105 River Street?</p> <p>2 A. I believe that was an semiannual premium.</p> <p>3 Q. And how did you make those payments?</p> <p>4 A. Those payments, I believe, at that point in</p> <p>13:32:46 5 time, were made by my wife Dayna.</p> <p>6 Q. Did she make them by check, if you would</p> <p>7 know?</p> <p>8 A. She would have made them by check.</p> <p>9 Q. Did you receive premium due notices for this</p> <p>13:33:16 10 policy?</p> <p>11 A. Again, up until that point in time, she was</p> <p>12 taking care of most of the insurances, so I</p> <p>13 don't know for sure.</p> <p>14 Q. Okay. Do you know what your policy period --</p> <p>13:33:46 15 the timeframe for a policy period would be?</p> <p>16 Would it be six months when you made your</p> <p>17 payment? Was it a yearlong policy?</p> <p>18 A. They were usually all carried out for</p> <p>19 one-year terms.</p> <p>13:34:08 20 (Deposition Exhibit Number 5 was</p> <p>21 marked for identification.)</p> <p>22 MR. ANDERSON: Does this match up</p> <p>23 with the Bates stamp numbers provided?</p> <p>24 MS. WEBER: It is the same</p> <p>13:34:35 25 document. I don't have the certified page</p>	<p style="text-align: right;">115</p> <p>1 for identification.)</p> <p>2 BY MS. WEBER:</p> <p>3 Q. Mr. Grant, I've handed you a document that</p> <p>4 we're marking Exhibit 6. Do you recognize</p> <p>13:36:46 5 this document?</p> <p>6 A. This looks more recognizable.</p> <p>7 Q. What is it?</p> <p>8 A. It is State Farm Fire and Casualty</p> <p>9 Declarations page.</p> <p>13:37:01 10 Q. And is this the Declarations page for your</p> <p>11 policy of the 105 River Street?</p> <p>12 A. Yes, it is.</p> <p>13 Q. Do you agree that Exhibit 5 and Exhibit 6</p> <p>14 constitute the entire agreement between you</p> <p>13:37:24 15 and State Farm?</p> <p>16 A. I could not say that with certainty.</p> <p>17 Q. Okay. Did you receive a copy of the policy</p> <p>18 when you bought it in 2015?</p> <p>19 A. Yes, I did.</p> <p>13:37:52 20 Q. Did you read a copy of the policy when you</p> <p>21 bought it in 2015?</p> <p>22 A. No, I did not.</p> <p>23 MR. ANDERSON: I'm going to object</p> <p>24 as to form. I believe that the policy '15-16</p> <p>13:38:05 25 is one policy, '16-17 is another policy so on</p>
<p style="text-align: right;">114</p> <p>1 for it.</p> <p>2 BY MS. WEBER:</p> <p>3 Q. Do you recognize this document?</p> <p>4 A. Yes, I do.</p> <p>13:34:55 5 Q. What is it?</p> <p>6 A. This is a State Farm Business Owners Coverage</p> <p>7 Form.</p> <p>8 Q. Is this the State Farm policy you had for 105</p> <p>9 River Street?</p> <p>13:35:09 10 MR. ANDERSON: Objection, form.</p> <p>11 Timeframe.</p> <p>12 BY MS. WEBER:</p> <p>13 Q. Is this the State Farm policy that -- for 105</p> <p>14 River Street during 2018?</p> <p>15 MR. ANDERSON: Did you hear the</p> <p>16 question?</p> <p>17 THE WITNESS: I did. Right now I'm</p> <p>18 just looking at verbiage. There's nothing to</p> <p>19 tell me if it is or isn't. Sorry, I get a</p> <p>13:35:44 20 cramp in my hand. In its present form, I</p> <p>21 can't tell if this is the policy or not.</p> <p>22 MS. WEBER: This may help.</p> <p>23 MR. ANDERSON: There's no</p> <p>24 Declaration page, how is he to know.</p> <p>25 (Deposition Exhibit 6 was marked</p>	<p style="text-align: right;">116</p> <p>1 and so forth, so I'll object as to form.</p> <p>2 Which policy are you referring to?</p> <p>3 BY MS. WEBER:</p> <p>4 Q. I asked when he purchased it in 2015, it's</p> <p>13:38:14 5 the 2015 policy. Did you read that?</p> <p>6 A. No, I did not.</p> <p>7 Q. Did you receive a copy of declarations and</p> <p>8 Endorsements for your 2016 policy?</p> <p>9 A. Yes, I did.</p> <p>13:38:31 10 Q. Did you read those?</p> <p>11 A. No, I did not.</p> <p>12 Q. Did you receive a copy of your Declarations</p> <p>13 and Endorsements for your 2017 policy?</p> <p>14 A. I cannot answer that with certainty.</p> <p>13:38:51 15 Q. Did you receive a copy of your Declaration</p> <p>16 and Endorsements for your 2018 policy?</p> <p>17 A. I do not know.</p> <p>18 Q. Did you receive a copy of your Declarations</p> <p>19 and Endorsements for your 2019 policy?</p> <p>13:39:15 20 MR. ANDERSON: Objection. Assuming</p> <p>21 facts not in evidence.</p> <p>22 BY MS. WEBER:</p> <p>23 Q. Go ahead and answer.</p> <p>24 A. Would the 2019 policy be starting January 1st</p> <p>13:39:26 25 '19, or would that be ending December 31st,</p>

<p style="text-align: right;">117</p> <p>1 '18?</p> <p>2 Q. The policy date would have been January 15,</p> <p>3 2019 to January 15, 2020?</p> <p>4 A. Then I can say no.</p> <p>13:39:42 5 Q. Did you read your policy at any time ever,</p> <p>6 your State Farm policy?</p> <p>7 MR. ANDERSON: Objection, form.</p> <p>8 Which policy?</p> <p>9 BY MS. WEBER:</p> <p>13:39:56 10 Q. Any State Farm policy have you read at any</p> <p>11 time?</p> <p>12 A. If this copy is a portion of what you're</p> <p>13 referring to as policy, no. (Indicating.)</p> <p>14 Q. Let the record that show Mr. Grant</p> <p>13:40:12 15 was holding up Exhibit 5.</p> <p>16 When you received a copy of your</p> <p>17 Declarations and Endorsements for any State</p> <p>18 Farm policy would you save those?</p> <p>19 A. Yes.</p> <p>13:40:34 20 Q. Where would you save them?</p> <p>21 A. Basically I've got a file folder that I keep</p> <p>22 all of my major documents in.</p> <p>23 Q. And do you keep that at home?</p> <p>24 A. Yes.</p> <p>13:40:53 25 Q. And that's where you would have saved your</p>	<p style="text-align: right;">119</p> <p>1 January 15, 2019, which I will refer to as</p> <p>2 the 2018 policy. When you received -- if you</p> <p>3 received those Declarations, what would you</p> <p>4 have done with them?</p> <p>13:42:16 5 A. I would have put them in my file folder.</p> <p>6 Q. Would you have read those when you received</p> <p>7 them?</p> <p>8 A. Declarations, I would have read.</p> <p>9 (Deposition Exhibit Number 7 was</p> <p>13:42:51 10 marked for identification.)</p> <p>11 BY MS. WEBER:</p> <p>12 Q. Mr. Grant, I just handed you a document that</p> <p>13 we are marking as Exhibit 7. Do you</p> <p>14 recognize this document?</p> <p>13:43:26 15 A. I do not recognize it, but it's been in my</p> <p>16 possession at one time because that's my</p> <p>17 handwriting.</p> <p>18 Q. I will represent to you that document was</p> <p>19 produced by you to State Farm through</p> <p>13:44:02 20 litigation.</p> <p>21 Can you please note for me the page</p> <p>22 numbers as noted at the bottom of the pages</p> <p>23 contained in this document?</p> <p>24 A. Both front and back?</p> <p>13:44:12 25 Q. Yeah. All the page numbers that you see.</p>
<p style="text-align: right;">118</p> <p>1 Declarations and Endorsements for your 2016</p> <p>2 policy, so that's the policy starting</p> <p>3 January 15, 2016, and running to January 15,</p> <p>4 2017?</p> <p>13:41:09 5 A. Yes.</p> <p>6 Q. And would you save your 2017 policy</p> <p>7 Declarations and Endorsements in the same</p> <p>8 location, and that would be the policy</p> <p>9 running from January 15, 2017 to January 15,</p> <p>10 2018?</p> <p>11 A. If I would have received the new Declaration,</p> <p>12 I would have gotten rid of the previous one.</p> <p>13 Q. But during 2017, is that where you would save</p> <p>14 your 2017 Declarations?</p> <p>13:41:35 15 A. That would be where I received it if I</p> <p>16 received it.</p> <p>17 MR. ANDERSON: I'll object as to</p> <p>18 form. When you say 2017, there's two</p> <p>19 possible policies if, in fact, that policy</p> <p>13:41:42 20 begins January 15th.</p> <p>21 BY MS. WEBER:</p> <p>22 Q. Your 2018 policy which began January 15,</p> <p>23 2018, and ran -- I'm sorry. I think I may</p> <p>24 have misstated that.</p> <p>13:42:01 25 January 15, 2018, through</p>	<p style="text-align: right;">120</p> <p>1 MR. ANDERSON: I'm just going to</p> <p>2 object as relevance. It says the page</p> <p>3 numbers on it.</p> <p>4 THE WITNESS: 1 of 7, 3 of 7, 5 of</p> <p>13:44:23 5 7, and no page.</p> <p>6 BY MS. WEBER:</p> <p>7 Q. That last one is kind of --</p> <p>8 A. Oh, 6 of 7. I got it.</p> <p>9 Q. As you just read, there's no page 2 of 7 or</p> <p>13:44:40 10 page 7 of 7 for this document. Do you know</p> <p>11 why page 2 or page 7 was not produced to us?</p> <p>12 A. No, I do not.</p> <p>13 Q. Can you read the middle of the bottom of the</p> <p>14 first page, page 1 of 7? The very bottom</p> <p>13:44:55 15 line in the middle?</p> <p>16 A. Oh, continued on reverse side.</p> <p>17 Q. Yes. So do you agree with me that it's</p> <p>18 likely that page 2 is on the backside of page</p> <p>19 1 of 7?</p> <p>13:45:08 20 A. I would with agree that.</p> <p>21 MR. ANDERSON: I'm just going to</p> <p>22 object to this line. This is a document that</p> <p>23 is in State Farms' possession. You guys know</p> <p>24 what page 2 and page 7 say.</p> <p>25 BY MS. WEBER:</p>

<p style="text-align: right;">121</p> <p>1 Q. Is there a reason this document wasn't 2 provided to us in discovery, page 2 of 7? 3 A. There's no reason it wasn't provided. 4 Q. Is there any reason that it wasn't provided 13:45:31 5 upon request of counsel on August 18, 2021? 6 A. Other than just a copying mistake or 7 inattention, perhaps. 8 Q. Is there any reason it wasn't provided upon 9 request of counsel on September 15, 2021? 13:45:48 10 MR. ANDERSON: Object as to facts 11 not in evidence. I don't know that he would 12 know what's in counsel's mind and as to why 13 may counsel may not have produced it. 14 BY MS. WEBER: 13:45:58 15 Q. Ahead and answer. 16 A. Repeat the question, please. 17 MS. WEBER: Could you read that 18 question back for us? 19 (Reporter read back.) 13:46:04 20 Q. 15th. 21 A. Of 2021. I was never asked myself to provide 22 anything to counsel that I can -- that's just 23 a month ago, correct? 24 Q. Correct. 13:46:41 25 A. All of my requests were made much earlier in</p>	<p style="text-align: right;">123</p> <p>1 I did. 2 (Deposition Exhibit Number 8 was 3 marked for identification.) 4 BY MS. WEBER: 13:50:16 5 Q. Mr. Grant, I'm showing you a document now 6 that we have marked as Exhibit 8. Do you 7 recognize this document? 8 A. Not with any certainty. 9 Q. Okay. Is that your name at the top of the 13:50:45 10 document under Named Insured? 11 A. Yes, it is. 12 Q. And what is the effective date and expiration 13 date on this document? 14 A. Effective date is January 15, '19 to 13:51:05 15 January 15, 2020. 16 Q. And is that your agent's information under 17 Agent and Mailing Address? 18 A. Yes, it is. 19 Q. And what is the policy number listed on this 20 document? 21 A. 99-BY-R[REDACTED] 22 Q. Would you go ahead and flip through this 23 document and take note of the page numbers? 24 A. Yes. 13:51:44 25 MR. ANDERSON: She hasn't asked a</p>
<p style="text-align: right;">122</p> <p>1 the year than that. 2 Q. Yes. Counsel followed up and asked for these 3 pages since they appear to be missing. So 4 I'm just wondering if you know why they 13:47:01 5 weren't provided on that request? 6 A. I never received a request. 7 Q. Okay. 8 MR. ANDERSON: I just have clarity. 9 She's asking I believe whether you know why 13:47:15 10 my firm did not produce those additional 11 pages based on a request from Attorney 12 Weber's firm. 13 THE WITNESS: Is that the question? 14 MS. WEBER: Yes. 13:47:27 15 THE WITNESS: Then no. 16 BY MS. WEBER: 17 Q. Can you please provide us these documents? 18 MR. ANDERSON: This is an 19 off-the-record thing. I need to talk to you 13:47:40 20 about. 21 (Off the record.) 22 BY MS. WEBER: 23 Q. Did you review this document when you 24 received it? 13:49:05 25 A. I would have to say normal practice would be</p>	<p style="text-align: right;">124</p> <p>1 question yet. 2 THE WITNESS: Yeah, you're right. 3 BY MS. WEBER: 4 Q. Is there any reason page 2 of 7 was not 13:51:53 5 provided? 6 A. Again, if this was provided by counsel, I 7 don't know why. 8 Q. Okay. Would you have reviewed this document 9 upon receipt of it? 13:52:28 10 A. Probably not this one. 11 Q. Why not? 12 A. The date is January 15, 2019, through 13 January 15, 2020, and this is post-hazard. 14 Q. Okay. Can you read the Prepared By date at 13:52:46 15 the bottom left corner of the page? 16 A. October 31, 2018. 17 Q. If you had received this sometime between 18 October 31, 2018, and December 29, 2018, 19 would you have reviewed it? 13:52:59 20 A. Under those conditions, yes. 21 Q. How did you come about working with State 22 Farm agent Chris LaMay? 23 A. The original agent, Jennifer Rivard, was an 24 acquaintance of my daughter, Polly, and my 13:53:36 25 daughter and son-in-law had insurance with</p>

<p style="text-align: right;">125</p> <p>1 the same State Farm brokerage.</p> <p>2 Q. And then after Jennifer left, you ended up</p> <p>3 working with Chris who's in the same office,</p> <p>4 correct?</p> <p>13:53:49 5 A. That's correct.</p> <p>6 Q. How did you generally communicate with Mr.</p> <p>7 LaMay's office?</p> <p>8 A. Usually by telephone.</p> <p>9 Q. Did you usually communicate directly with him</p> <p>13:54:04 10 or somebody in his office?</p> <p>11 A. Both.</p> <p>12 Q. Specifically during the claims process, so</p> <p>13 we're talking after the fire, December 29,</p> <p>14 2019, how did you communicate with Mr. LaMay?</p> <p>13:54:26 15 A. I don't think there was any communication</p> <p>16 with Mr. LaMay at all after the fire, other</p> <p>17 than to report the loss.</p> <p>18 Q. Throughout the claims process for this fire,</p> <p>19 how did you communicate with State Farm?</p> <p>13:54:51 20 A. The only communication that was done with</p> <p>21 State Farm is usually when they contacted me.</p> <p>22 Q. Between 2015, when you procured the policy</p> <p>23 and the fire, did you ever cancel your State</p> <p>24 Farm policy, this State Farm policy?</p> <p>13:55:27 25 A. No.</p>	<p style="text-align: right;">127</p> <p>1 A. Basically, with the payment of a premium, it</p> <p>2 automatically reinstated.</p> <p>3 Q. Did you ever request your limits be increased</p> <p>4 on this policy?</p> <p>13:57:20 5 A. No.</p> <p>6 Q. I want to flip back to Exhibit 6, which is</p> <p>7 the Declarations. I take that back. We have</p> <p>8 to start at Exhibit 7.</p> <p>9 On Exhibit 7 at the bottom left</p> <p>13:58:14 10 corner of the first page, can you read the</p> <p>11 prepared by date for me?</p> <p>12 A. Prepared November 2, 2017.</p> <p>13 Q. And what is the effective date and expiration</p> <p>14 date on this?</p> <p>13:58:27 15 A. January 15, 2018, to January 15, 2019.</p> <p>16 Q. Do you believe you received this document</p> <p>17 prior to January 15, 2018?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Now we can go back to Exhibit 6. Can</p> <p>13:58:54 20 you read the prepared by date at the bottom</p> <p>21 left corner on Exhibit 6 for me?</p> <p>22 A. Prepared October 19, 2018.</p> <p>23 Q. And can you read the effective date and</p> <p>24 expiration date?</p> <p>13:59:07 25 A. Effective date, January 15, 2018, to</p>
<p style="text-align: right;">126</p> <p>1 Q. Did the policy ever lapse?</p> <p>2 A. Yes.</p> <p>3 Q. When did it lapse?</p> <p>4 A. I believe it lapsed midyear of 2018.</p> <p>13:55:37 5 Q. Why did it lapse?</p> <p>6 A. That is when I was trying to find another</p> <p>7 insurer to replace this policy.</p> <p>8 Q. Why did you decide to stick with State Farm?</p> <p>9 A. The reason that I tried -- the reason I</p> <p>13:55:56 10 stayed with State Farm is because the</p> <p>11 comparable premiums that were given to me</p> <p>12 were for a much higher value on the building,</p> <p>13 which would have caused an increase in</p> <p>14 premium, and when I went back to Chris to say</p> <p>13:56:18 15 that another insurance company has quoted me</p> <p>16 a policy with a larger value, what would</p> <p>17 State Farm's premium be for that same value.</p> <p>18 He took about a week to come back to me and</p> <p>19 said that they would not insure it for that</p> <p>13:56:41 20 value, but they would increase it from 4</p> <p>21 something to the new price of 558 without any</p> <p>22 premium increase. That's the reason that</p> <p>23 policy stayed in force.</p> <p>24 Q. After Mr. LaMay informed you of that, did you</p> <p>13:57:04 25 request he reinstate the policy?</p>	<p style="text-align: right;">128</p> <p>1 January 15, 2019.</p> <p>2 Q. And in the middle of the page, it says Reason</p> <p>3 For Declarations, can you read those to me?</p> <p>4 A. Your policy is amended September 27, 2018,</p> <p>13:59:26 5 building coverage changed.</p> <p>6 Q. Why would you have received these</p> <p>7 declarations?</p> <p>8 A. This is probably from the conversation that I</p> <p>9 had with Chris LaMay when we had talked about</p> <p>13:59:51 10 the comparative policies.</p> <p>11 Q. So after Mr. LaMay let you know you could get</p> <p>12 increased building coverage, does it appear</p> <p>13 by this document that your coverage was</p> <p>14 increased?</p> <p>14:00:06 15 A. It was increased to the 558.</p> <p>16 Q. Did you review this document when you</p> <p>17 received it?</p> <p>18 A. Yes.</p> <p>19 Q. So it's fair to say that you knew your policy</p> <p>14:00:27 20 limits in October, or November, fall of 2018?</p> <p>21 A. That's fair to say.</p> <p>22 Q. We're here to discuss a claim in this</p> <p>23 litigation, to discuss a claim for a fire</p> <p>24 loss at 105 River Street; is that correct?</p> <p>14:00:56 25 A. Yes.</p>

<p style="text-align: right;">129</p> <p>1 Q. When did that fire occur?</p> <p>2 A. December 29th, early morning hours, 2018.</p> <p>3 Q. Where were you at the time of the fire?</p> <p>4 A. At my residence, 2648 State Road 64.</p> <p>14:01:12 5 Q. Who were you with?</p> <p>6 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>7</p> <p>8 Q. How did you find out about the fire?</p> <p>9 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>14:01:29 10</p> <p>11 Q. What did you do after you found out about the fire?</p> <p>12</p> <p>13 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>14</p> <p>14:01:38 15 Q. Did you go to 105 River Street after you found out about the fire?</p> <p>16</p> <p>17 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>18</p> <p>19 Q. Were you at 10 River Street while the fire was still burning?</p> <p>14:01:51 20</p> <p>21 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>22</p> <p>23 Q. Did you speak with anybody at the property, 105 River Street, when you arrived thereafter the -- or during the fire, after you found</p> <p>14:02:05 25</p>	<p style="text-align: right;">131</p> <p>1 Q. The last time you were at the property prior to the fire, what were you doing?</p> <p>2</p> <p>3 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>4</p> <p>14:02:55 5 Q. The last time you were at the property prior to the fire, how long were you there?</p> <p>6</p> <p>7 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>8</p> <p>9 Q. After you left the property the last time you were there, where did you go next?</p> <p>14:03:12 10</p> <p>11 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>12</p> <p>13 Q. Who have you spoken with regarding the fire?</p> <p>14 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>14:03:22 15</p> <p>16 Q. Have you talked to any family members regarding the fire?</p> <p>17</p> <p>18 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>19</p> <p>14:03:29 20 Q. Have you talked to any friends regarding the fire?</p> <p>21</p> <p>22 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>23</p> <p>24 Q. Have you talked to any law enforcement officers regarding the fire?</p> <p>14:03:40 25</p>
<p style="text-align: right;">130</p> <p>1 out about the fire?</p> <p>2 MR. ANDERSON: Objection. Assumes facts not in evidence.</p> <p>3</p> <p>4 THE WITNESS: On the advice of</p> <p>14:02:13 5 counsel, I elect to assert my Fifth Amendment privilege.</p> <p>6</p> <p>7 Q. Did you speak with any law enforcement officials regarding the fire?</p> <p>8</p> <p>9 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>10</p> <p>11 Q. When was the last time you were at the property before the fire?</p> <p>12</p> <p>13 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>14</p> <p>14:02:27 15 Q. What did you do while you were there?</p> <p>16 MR. ANDERSON: Objection. Assuming facts not in evidence.</p> <p>17</p> <p>18 THE WITNESS: On the advice of</p> <p>19 counsel, I elect to assert my Fifth Amendment privilege.</p> <p>14:02:35 20</p> <p>21 BY MS. WEBER:</p> <p>22 Q. The last time you were at the property prior to the fire, were you alone?</p> <p>23</p> <p>24 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>14:02:47 25</p>	<p style="text-align: right;">132</p> <p>1 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>2</p> <p>3 Q. Have you talked to the state fire marshal regarding the fire?</p> <p>4</p> <p>14:03:48 5 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>6</p> <p>7 Q. Have you talked to anybody at State Farm regarding the fire?</p> <p>8</p> <p>9 A. On the advice of counsel, I elect to assert my Fifth Amendment privilege.</p> <p>14:04:01 10</p> <p>11 (Deposition Exhibit Number 9 was marked for identification.)</p> <p>12</p> <p>13 BY MS. WEBER:</p> <p>14 Q. Mr. Grant, I'm showing you a document that we have marked as Exhibit 9. Do you recognize this document?</p> <p>14:04:25 15</p> <p>16</p> <p>17 A. Yes, I do.</p> <p>18 Q. What is it?</p> <p>19 A. This is a recorded interview by Greg Peterson.</p> <p>14:04:38 20</p> <p>21 Q. And who is Greg Peterson, if you know?</p> <p>22 A. I'm not sure what capacity he's in, but he is a State Farm associate.</p> <p>23</p> <p>24 Q. He works for State Farm?</p> <p>14:04:51 25 A. Okay.</p>

<p style="text-align: right;">133</p> <p>1 Q. That was a question?</p> <p>2 A. As far as I know, he does.</p> <p>3 Q. Is everything that you said in this statement</p> <p>4 still correct?</p> <p>14:05:05 5 A. On the advice of counsel, I elect to assert</p> <p>6 my Fifth Amendment privilege.</p> <p>7 Q. Is there anything in this document that you'd</p> <p>8 like to change?</p> <p>9 A. On the advice of counsel, I elect to assert</p> <p>14:05:14 10 my Fifth Amendment privilege.</p> <p>11 Q. Are you aware of any results of the</p> <p>12 investigation into the fire?</p> <p>13 A. On the advice of counsel, I elect to assert</p> <p>14 my Fifth Amendment privilege.</p> <p>14:05:31 15 Q. Has law enforcement arrested anybody in</p> <p>16 connection with the fire?</p> <p>17 A. On the advice of counsel, I elect to assert</p> <p>18 my Fifth Amendment privilege.</p> <p>19 Q. Has law enforcement determined how the fire</p> <p>14:05:46 20 started?</p> <p>21 A. On the advice of counsel, I elect to assert</p> <p>22 my Fifth Amendment privilege.</p> <p>23 Q. After the fire, did you submit a claim to</p> <p>24 State Farm for the fire loss?</p> <p>14:06:21 25 A. On the advice of counsel, I elect to assert</p>	<p style="text-align: right;">135</p> <p>1 (Deposition Exhibit Number 11 was</p> <p>2 marked for identification.)</p> <p>3 BY MS. WEBER:</p> <p>4 Q. Mr. Grant, I'm now showing you a document</p> <p>14:08:12 5 marked as Exhibit 11. Do you recognize this</p> <p>6 document?</p> <p>7 A. On the advice of counsel, I elect to assert</p> <p>8 my Fifth Amendment privilege.</p> <p>9 Q. Did you receive this document in connection</p> <p>14:08:23 10 with a payment from State Farm on your</p> <p>11 building coverage claim?</p> <p>12 A. On the advice of counsel, I elect to assert</p> <p>13 my Fifth Amendment privilege.</p> <p>14 Q. Has State Farm paid \$568,000 -- I'm sorry,</p> <p>14:08:39 15 let me try this. Has State Farm paid</p> <p>16 \$568,044 on your building coverage claim</p> <p>17 related to the fire?</p> <p>18 A. On the advice of counsel, I elect to assert</p> <p>19 my Fifth Amendment privilege.</p> <p>14:09:16 20 (Deposition Exhibit Number 12 was</p> <p>21 marked for identification.)</p> <p>22 BY MS. WEBER:</p> <p>23 Q. Mr. Grant, I'm showing you a document marked</p> <p>24 Exhibit 12. Do you recognize this document?</p> <p>14:09:24 25 A. On the advice of counsel, I elect to assert</p>
<p style="text-align: right;">134</p> <p>1 my Fifth Amendment privilege.</p> <p>2 Q. If you did submit such a claim, when did you</p> <p>3 do so?</p> <p>4 A. On the advice of counsel, I elect to assert</p> <p>14:06:29 5 my Fifth Amendment privilege.</p> <p>6 Q. Walk me through what happened with State Farm</p> <p>7 after the fire?</p> <p>8 A. On the advice of counsel, I elect to assert</p> <p>9 my Fifth Amendment privilege.</p> <p>14:06:36 10 Q. Did State Farm make any payments to you</p> <p>11 regarding the fire?</p> <p>12 A. Yes.</p> <p>13 (Deposition Exhibit Number 10 was</p> <p>14 marked for identification.)</p> <p>15 BY MS. WEBER:</p> <p>16 Q. Mr. Grant, I'm now showing you a document</p> <p>17 that's been marked as Exhibit 10. Do you</p> <p>18 recognize this document?</p> <p>19 A. On the advice of counsel, I elect to assert</p> <p>14:07:37 20 my Fifth Amendment privilege.</p> <p>21 Q. Does this document accurately reflect the</p> <p>22 amount State Farm paid on your building</p> <p>23 coverage claim?</p> <p>24 A. On the advice of counsel, I elect to assert</p> <p>14:07:57 25 my Fifth Amendment privilege.</p>	<p style="text-align: right;">136</p> <p>1 my Fifth Amendment privilege.</p> <p>2 Q. Does this document accurately reflect what</p> <p>3 State Farm has paid on your personal property</p> <p>4 claim?</p> <p>14:09:32 5 A. On the advice of counsel, I elect to assert</p> <p>6 my Fifth Amendment privilege.</p> <p>7 Q. Has State Farm paid you a total of \$14,792.03</p> <p>8 on your business personal property claim?</p> <p>9 A. On the advice of counsel, I elect to assert</p> <p>14:09:47 10 my Fifth Amendment privilege.</p> <p>11 (Deposition Exhibit Number 13 was</p> <p>12 marked for identification.)</p> <p>13 BY MS. WEBER:</p> <p>14 Q. Mr. Grant, I'm now showing you a document</p> <p>14:10:06 15 that's marked Exhibit 13. Did you receive</p> <p>16 this document in connection with the personal</p> <p>17 property payment made to you?</p> <p>18 A. On the advice of counsel, I elect to assert</p> <p>19 my Fifth Amendment privilege.</p> <p>14:10:22 20 (Deposition Exhibit Number 14 was</p> <p>21 marked for identification.)</p> <p>22 BY MS. WEBER:</p> <p>23 Q. Mr. Grant, I'm now showing you a document we</p> <p>24 have marked as Exhibit 14. Do you recognize</p> <p>14:10:56 25 this document?</p>

<p style="text-align: right;">137</p> <p>1 A. On the advice of counsel, I elect to assert 2 my Fifth Amendment privilege. 3 Q. Does this document accurately reflect payment 4 State Farm has made to you for business 14:11:08 5 interruption? 6 A. On the advice of counsel, I elect to assert 7 my Fifth Amendment privilege. 8 Q. Is it correct that State Farm has made 9 \$390.67 for business interruption on your 14:11:19 10 claim related to the fire? 11 A. On the advice of counsel, I elect to assert 12 my Fifth Amendment privilege. 13 (Deposition Exhibit Number 15 was 14 marked for identification.) 14:11:43 15 BY MS. WEBER: 16 Q. Mr. Grant, I'm now showing you a document 17 marked as Exhibit 15. Do you recognize this 18 document? 19 A. On the advice of counsel, I elect to assert 14:11:52 20 my Fifth Amendment privilege. 21 Q. Did you receive this document in connection 22 with the State Farm payment made to you for 23 loss of income of \$390.67? 24 A. On the advice of counsel, I elect to assert 14:12:16 25 my Fifth Amendment privilege.</p>	<p style="text-align: right;">139</p> <p>1 BY MS. WEBER: 2 Q. Mr. Grant, I'm now showing you a document we 3 have marked Exhibit 17. Did you receive this 4 letter dated May 29, 2019, from State Farm in 14:14:05 5 relation to your claim? 6 A. On the advice of counsel, I elect to assert 7 my Fifth Amendment privilege. 8 Q. To date, has State Farm paid a total of 9 \$585,726.69 on your fire loss claim? 14:14:23 10 A. On the advice of counsel, I elect to assert 11 my Fifth Amendment privilege. 12 (Deposition Exhibit Number 18 was 13 marked for identification.) 14 MS. WEBER: We can go off the 14:14:45 15 record. 16 (At this time a recess was taken.) 17 BY MS. WEBER: 18 Q. Mr. Grant, I'm now showing you a document 19 that's been marked Exhibit 18. Do you 20 recognize this document? 14:22:57 21 A. On the advice of counsel, I elect to assert 22 my Fifth Amendment privilege. 23 Q. Did you receive this document in relation to 24 your claim from State Farm? 14:23:04 25 A. On the advice of counsel, I elect to assert</p>
<p style="text-align: right;">138</p> <p>1 (Deposition Exhibit Number 16 was 2 marked for identification.) 3 Q. Mr. Grant, I'm now showing you a document 4 marked as Exhibit 16. Do you recognize this 14:12:40 5 document? 6 A. On the advice of counsel, I elect to assert 7 my Fifth Amendment privilege. 8 Q. Does this document accurately reflect the 9 payment State Farm made to the Village of 14:12:54 10 Woodville in relation to your claim for the 11 fire loss? 12 A. On the advice of counsel, I elect to assert 13 my Fifth Amendment privilege. 14 Q. Is it correct that State Farm has paid \$2,500 14:13:10 15 in fire department fees under your policy in 16 relation to the fire? 17 A. On the advice of counsel, I elect to assert 18 my Fifth Amendment privilege. 19 Q. Do the four payments we just discussed 14:13:24 20 represent all payments from State Farm on 21 your claim? 22 A. On the advice of counsel, I elect to assert 23 my Fifth Amendment privilege. 24 (Deposition Exhibit Number 17 was 14:13:53 25 marked for identification.)</p>	<p style="text-align: right;">140</p> <p>1 my Fifth Amendment privilege. 2 Q. How long was January 29, 2019, after the 3 fire? 4 A. On the advice of counsel, I elect to assert 14:23:26 5 my Fifth Amendment privilege. 6 (Deposition Exhibit Number 19 was 7 marked for identification.) 8 BY MS. WEBER: 9 Q. Mr. Grant, I'm now showing a document we've 14:23:47 10 marked as Exhibit 19. 11 MR. ANDERSON: It's 20, I believe. 12 We just did 19. 13 MS. WEBER: We just did 18. 14 MR. ANDERSON: You're right. I 14:24:03 15 can't read my writing. 16 BY MS. WEBER: 17 Q. Mr. Grant, showing you a document marked as 18 Exhibit 19. Do you recognize this document? 19 A. On the advice of counsel, I elect to assert 14:24:12 20 my Fifth Amendment privilege. 21 Q. Did you receive this document from State Farm 22 in relation to your claim for the fire loss? 23 A. On the advice of counsel, I elect to assert 24 my Fifth Amendment privilege. 14:24:25 25 Q. Who is Katie Bosworth?</p>

<p style="text-align: right;">141</p> <p>1 A. On the advice of counsel, I elect to assert</p> <p>2 my Fifth Amendment privilege.</p> <p>3 Q. Did Katie Bosworth represent you in this</p> <p>4 relation claim at any time?</p> <p>14:24:44 5 A. On the advice of counsel, I elect to assert</p> <p>6 my Fifth Amendment privilege.</p> <p>7 Q. Was Katie Bosworth authorized to speak with</p> <p>8 State Farm on your behalf in relation to this</p> <p>9 claim?</p> <p>14:24:57 10 A. On the advice of counsel, I elect to assert</p> <p>11 my Fifth Amendment privilege.</p> <p>12 (Deposition Exhibit Number 20 was</p> <p>13 marked for identification.)</p> <p>14 BY MS. WEBER:</p> <p>14:25:22 15 Q. Mr. Grant, I'm now showing you a document</p> <p>16 that we have marked as Exhibit 20. I would</p> <p>17 also like to note that Exhibit 20 at the</p> <p>18 bottom says Exhibit 4. It's dated 3-18-20.</p> <p>19 Exhibit 4 doesn't relate to this deposition</p> <p>14:25:45 20 exhibit.</p> <p>21 Do you recognize this document?</p> <p>22 A. On the advice of counsel, I elect to assert</p> <p>23 my Fifth Amendment privilege.</p> <p>24 Q. On the second page of this document, is that</p> <p>14:25:54 25 your signature?</p>	<p style="text-align: right;">143</p> <p>1 have now marked as Exhibit 22. Do you</p> <p>2 recognize this document?</p> <p>3 A. On the advice of counsel, I elect to assert</p> <p>4 my Fifth Amendment privilege.</p> <p>14:28:07 5 Q. Did you receive this document from State Farm</p> <p>6 in relation to your fire loss claim?</p> <p>7 A. On the advice of counsel, I elect to assert</p> <p>8 my Fifth Amendment privilege.</p> <p>9 (Deposition Exhibit Number 23 was</p> <p>14:28:18 10 marked for identification.)</p> <p>11 BY MS. WEBER:</p> <p>12 Q. Mr. Grant, I'm now showing a document that</p> <p>13 we've marked as Exhibit 23. Do you recognize</p> <p>14 this document?</p> <p>14:28:37 15 A. On the advice of counsel, I elect to assert</p> <p>16 my Fifth Amendment privilege.</p> <p>17 Q. Did you receive this document in relation to</p> <p>18 your -- from State Farm in relation to your</p> <p>19 fire loss claim?</p> <p>14:28:47 20 A. On the advice of counsel, I elect to assert</p> <p>21 my Fifth Amendment privilege.</p> <p>22 (Deposition Exhibit Number 24 was</p> <p>23 marked for identification.)</p> <p>24 BY MS. WEBER:</p> <p>14:29:09 25 Q. Mr. Grant, I'm now showing you a document</p>
<p style="text-align: right;">142</p> <p>1 A. On the advice of counsel, I elect to assert</p> <p>2 my Fifth Amendment privilege.</p> <p>3 Q. What date did you sign this document?</p> <p>4 A. On the advice of counsel, I elect to assert</p> <p>14:26:04 5 my Fifth Amendment privilege.</p> <p>6 Q. Did you submit this document to State Farm in</p> <p>7 relation to your fire loss claim?</p> <p>8 A. On the advice of counsel, I elect to assert</p> <p>9 my Fifth Amendment privilege.</p> <p>14:26:15 10 (Deposition Exhibit Number 21 was</p> <p>11 marked for identification.)</p> <p>12 BY MS. WEBER:</p> <p>13 Q. Mr. Grant, I'm now showing you a document we</p> <p>14 have marked as Exhibit 21. Do you recognize</p> <p>14:26:49 15 this document?</p> <p>16 A. On the advice of counsel, I elect to assert</p> <p>17 my Fifth Amendment privilege.</p> <p>18 Q. Did you receive this document in relation to</p> <p>19 your fire loss claim?</p> <p>14:26:55 20 A. On the advice of counsel, I elect to assert</p> <p>21 my Fifth Amendment privilege.</p> <p>22 (Deposition Exhibit Number 22 was</p> <p>23 marked for identification.)</p> <p>24 BY MS. WEBER:</p> <p>14:28:01 25 Q. Mr. Grant, I'm showing you a document that we</p>	<p style="text-align: right;">144</p> <p>1 marked as Exhibit 24. Do you recognize this</p> <p>2 document?</p> <p>3 A. On the advice of counsel, I elect to assert</p> <p>4 my Fifth Amendment privilege.</p> <p>14:29:19 5 Q. Did you receive this document from State Farm</p> <p>6 counsel Kevin J. Kennedy in relation to your</p> <p>7 fire loss claim?</p> <p>8 A. On the advice of counsel, I elect to assert</p> <p>9 my Fifth Amendment privilege.</p> <p>14:29:35 10 (Deposition Exhibit Number 25 was</p> <p>11 marked for identification.)</p> <p>12 BY MS. WEBER:</p> <p>13 Q. Mr. Grant, I'm now showing you a document</p> <p>14 we've marked as Exhibit 25. Do you recognize</p> <p>14:29:53 15 this document?</p> <p>16 A. On the advice of counsel, I elect to assert</p> <p>17 my Fifth Amendment privilege.</p> <p>18 Q. Did you receive this document from State Farm</p> <p>19 in relation to your fire loss claim?</p> <p>14:30:02 20 A. On the advice of counsel, I elect to assert</p> <p>21 my Fifth Amendment privilege.</p> <p>22 (Deposition Exhibit Number 26 was</p> <p>23 marked for identification.)</p> <p>24 BY MS. WEBER:</p> <p>14:30:22 25 Q. Mr. Grant, I'm now showing you a document we</p>

<p style="text-align: center;">145</p> <p>1 have marked as Exhibit 26. Do you recognize</p> <p>2 this document?</p> <p>3 A. On the advice of counsel, I elect to assert</p> <p>4 my Fifth Amendment privilege.</p> <p>14:30:27 5 Q. Did you receive this document from State Farm</p> <p>6 in relation to your fire loss claim?</p> <p>7 A. On the advice of counsel, I elect to assert</p> <p>8 my Fifth Amendment privilege.</p> <p>9 (Deposition Exhibit Number 27 was</p> <p>14:30:40 10 marked for identification.)</p> <p>11 BY MS. WEBER:</p> <p>12 Q. Mr. Grant, I'm now showing you a document</p> <p>13 marked as Exhibit 27. Do you recognize this</p> <p>14 document?</p> <p>14:31:00 15 A. On the advice of counsel, I elect to assert</p> <p>16 my Fifth Amendment privilege.</p> <p>17 Q. Did you receive this document from State Farm</p> <p>18 in relation to your fire loss claim?</p> <p>19 A. On the advice of counsel, I elect to assert</p> <p>14:31:09 20 my Fifth Amendment privilege.</p> <p>21 Q. Mr. Grant, in relation to this lawsuit, what</p> <p>22 claims are you making against State Farm?</p> <p>23 A. On the advice of counsel, I elect to assert</p> <p>24 my Fifth Amendment privilege.</p> <p>14:32:01 25 Q. In this action, are you claiming that State</p>	<p style="text-align: center;">147</p> <p>1 Q. Do you believe State Farm acted negligently</p> <p>2 in issuing this policy to you?</p> <p>3 A. On the advice of counsel, I elect to assert</p> <p>4 my Fifth Amendment privilege.</p> <p>14:33:14 5 Q. Do you believe State Farm, its agents or</p> <p>6 employees acted negligently regarding the</p> <p>7 insurance policy issued by State Farm to you?</p> <p>8 A. On the advice of counsel, I elect to assert</p> <p>9 my Fifth Amendment privilege.</p> <p>14:33:51 10 Q. Do you believe State Farm failed to timely</p> <p>11 pay your insurance claim related to the fire?</p> <p>12 A. On the advice of counsel, I elect to assert</p> <p>13 my Fifth Amendment privilege.</p> <p>14 Q. Did State Farm deny your claim for the fire</p> <p>14:34:24 15 loss related to the fire?</p> <p>16 MR. ANDERSON: That was a good</p> <p>17 question. But we'll still answer.</p> <p>18 (Indicating.)</p> <p>19 THE WITNESS: On the advice of</p> <p>20 counsel, I elect to assert my Fifth Amendment</p> <p>21 privilege.</p> <p>22 MS. WEBER: Can you read my</p> <p>23 terrible question back to me?</p> <p>24 (Reporter Read Back.)</p> <p>14:35:06 25 MS. WEBER: I'm going to try that</p>
<p style="text-align: center;">146</p> <p>1 Farm breached its insurance contract?</p> <p>2 A. On the advice of counsel, I elect to assert</p> <p>3 my Fifth Amendment privilege.</p> <p>4 Q. In this action, are you alleging that State</p> <p>14:32:16 5 Farm acted in bad faith in the adjustment of</p> <p>6 your claim?</p> <p>7 A. On the advice of counsel, I elect to assert</p> <p>8 my Fifth Amendment privilege.</p> <p>9 Q. And in this action, are you claiming that</p> <p>14:32:24 10 State Farm acted negligently?</p> <p>11 A. On the advice of counsel, I elect to assert</p> <p>12 my Fifth Amendment privilege.</p> <p>13 Q. Can you state the facts upon which you base</p> <p>14 your breach of contract claim?</p> <p>14:32:41 15 A. On the advice of counsel, I elect to assert</p> <p>16 my Fifth Amendment privilege.</p> <p>17 Q. Do you believe State Farm breached the</p> <p>18 contract the policy contract between yourself</p> <p>19 and State Farm?</p> <p>14:32:49 20 A. On the advice of counsel, I elect to assert</p> <p>21 my Fifth Amendment privilege.</p> <p>22 Q. Do you believe State Farm acted in bad faith</p> <p>23 in the adjustment of your fire loss claim?</p> <p>24 A. On the advice of counsel, I elect to assert</p> <p>14:33:01 25 my Fifth Amendment privilege.</p>	<p style="text-align: center;">148</p> <p>1 question again.</p> <p>2 MR. ANDERSON: Okay. Rephrase.</p> <p>3 BY MS. WEBER:</p> <p>4 Q. Did State Farm deny your claim for the fire</p> <p>14:35:17 5 loss?</p> <p>6 A. On the advice of counsel, I elect to assert</p> <p>7 my Fifth Amendment privilege.</p> <p>8 MR. ANDERSON: Give me five</p> <p>9 seconds.</p> <p>14:35:42 10 (Off the record.)</p> <p>11 BY MS. WEBER:</p> <p>12 Q. What is the current condition of 105 River</p> <p>13 Street?</p> <p>14 A. On the advice of counsel, I elect to assert</p> <p>14:36:32 15 my Fifth Amendment privilege.</p> <p>16 (Deposition Exhibit Number 28 was</p> <p>17 marked for identification.)</p> <p>18 BY MS. WEBER:</p> <p>19 Q. Mr. Grant, has any demolition been done at</p> <p>14:36:54 20 105 River Street?</p> <p>21 A. On the advice of counsel, I elect to assert</p> <p>22 my Fifth Amendment privilege.</p> <p>23 Q. Have you paid for any demolition done at 105</p> <p>24 River Street since the fire?</p> <p>14:37:05 25 A. On the advice of counsel, I elect to assert</p>

<p style="text-align: right;">149</p> <p>1 my Fifth Amendment privilege.</p> <p>2 Q. Has any debris been removed from 105 River</p> <p>3 Street since the fire?</p> <p>4 A. On the advice of counsel, I elect to assert</p> <p>14:37:13 5 my Fifth Amendment privilege.</p> <p>6 Q. Has any debris been removed from 105 River</p> <p>7 Street since the fire?</p> <p>8 A. On the advice of counsel, I elect to assert</p> <p>9 my Fifth Amendment privilege.</p> <p>14:37:22 10 Q. If you go to page 4 of the Exhibit 28.</p> <p>11 MR. ANDERSON: I have them</p> <p>12 numbered, but is that the same one that, look</p> <p>13 further way down, has interrogatory number 7</p> <p>14 on it.</p> <p>14:37:45 15 MS. WEBER: Yes.</p> <p>16 BY MS. WEBER:</p> <p>17 Q. At the bottom of the previous page and the</p> <p>18 top of the page I had you flip to, are you</p> <p>19 claiming that State Farm owes you \$179,000</p> <p>14:38:02 20 for debris removal?</p> <p>21 A. On the advice of counsel, I elect to assert</p> <p>22 my Fifth Amendment privilege.</p> <p>23 Q. How was this number calculated?</p> <p>24 A. On the advice of counsel, I elect to assert</p> <p>14:38:15 25 my Fifth Amendment privilege.</p>	<p style="text-align: right;">151</p> <p>1 A. On the advice of counsel, I elect to assert</p> <p>2 my Fifth Amendment privilege.</p> <p>3 Q. On the last page of Exhibit 28, is that your</p> <p>4 signature?</p> <p>14:40:17 5 A. On the advice of counsel, I elect to assert</p> <p>6 my Fifth Amendment privilege.</p> <p>7 Q. Have you paid \$8,200 to rent an alternate</p> <p>8 facility?</p> <p>9 A. On the advice of counsel, I elect to assert</p> <p>14:40:31 10 my Fifth Amendment privilege.</p> <p>11 Q. When did you pay this amount?</p> <p>12 A. On the advice of counsel, I elect to assert</p> <p>13 my Fifth Amendment privilege.</p> <p>14 Q. Who did you pay this amount to?</p> <p>14:40:43 15 A. On the advice of counsel, I elect to assert</p> <p>16 my Fifth Amendment privilege.</p> <p>17 MR. ANDERSON: Objection. Assuming</p> <p>18 facts not in evidence.</p> <p>19 THE WITNESS: On the advice of</p> <p>20 counsel, I elect to assert my Fifth Amendment</p> <p>21 privilege.</p> <p>22 BY MS. WEBER:</p> <p>23 Q. Did you submit to State Farm through the</p> <p>24 course of the claim the cost of renting an</p> <p>14:41:06 25 alternate facility?</p>
<p style="text-align: right;">150</p> <p>1 Q. Did you spend \$179,000 for debris removal</p> <p>2 related to the fire at 105 River Street?</p> <p>3 A. On the advice of counsel, I elect to assert</p> <p>4 my Fifth Amendment privilege.</p> <p>14:38:26 5 Q. Do you have any invoices evidencing payments</p> <p>6 made for debris removal at 105 River Street</p> <p>7 in relation to the fire?</p> <p>8 A. On the advice of counsel, I elect to assert</p> <p>9 my Fifth Amendment privilege.</p> <p>14:38:45 10 Q. I refer you again to the top of the fourth</p> <p>11 page of Exhibit 28. Here it says State Farm</p> <p>12 allegedly owes you \$8,200 for the cost of</p> <p>13 renting an alternative facility. How was</p> <p>14 this number calculated?</p> <p>14:39:12 15 MR. ANDERSON: Off the record for a</p> <p>16 second.</p> <p>17 (Off the record.)</p> <p>18 MS. WEBER: Can you read that</p> <p>19 question back?</p> <p>14:39:50 20 (Reporter read back.)</p> <p>21 THE WITNESS: On the advice of</p> <p>22 counsel, I elect to assert my Fifth Amendment</p> <p>23 privilege.</p> <p>24 BY MS. WEBER:</p> <p>14:40:05 25 Q. Do you recognize Exhibit 28?</p>	<p style="text-align: right;">152</p> <p>1 A. On the advice of counsel, I elect to assert</p> <p>2 my Fifth Amendment privilege.</p> <p>3 Q. Exhibit 28 you list damages allegedly owed to</p> <p>4 you by State Farm for interruption of income,</p> <p>14:41:29 5 \$28,700. How was this number calculated?</p> <p>6 A. On the advice of counsel, I elect to assert</p> <p>7 my Fifth Amendment privilege.</p> <p>8 Q. Do you have any documents supporting loss of</p> <p>9 income related to the fire?</p> <p>14:41:52 10 A. On the advice of counsel, I elect to assert</p> <p>11 my Fifth Amendment privilege.</p> <p>12 (Deposition Exhibit Number 29 was</p> <p>13 marked for identification.)</p> <p>14 BY MS. WEBER:</p> <p>14:42:22 15 Q. Mr. Grant, I'm now showing you a document we</p> <p>16 have marked as Exhibit 29. Do you recognize</p> <p>17 this document?</p> <p>18 A. On the advice of counsel, I elect to assert</p> <p>19 my Fifth Amendment privilege.</p> <p>14:42:42 20 Q. At the top of this document, does it say</p> <p>21 State of Wisconsin, plaintiff, versus Kevin</p> <p>22 Joseph Grant?</p> <p>23 A. On the advice of counsel, I elect to assert</p> <p>24 my Fifth Amendment privilege.</p> <p>14:42:57 25 Q. At the top of this document, does it also</p>

<p style="text-align: center;">153</p> <p>1 state State of Wisconsin, Circuit Court, St. 2 Croix County? 3 A. On the advice of counsel, I elect to assert 4 my Fifth Amendment privilege. 14:43:06 5 Q. At the top of this document in red, does it 6 say filed 7-9-2021? 7 A. On the advice of counsel, I elect to assert 8 my Fifth Amendment privilege. 9 Q. Does this document also state it is a 14:43:19 10 criminal complaint and warrant? 11 A. On the advice of counsel, I elect to assert 12 my Fifth Amendment privilege. 13 Q. The state contends you intentionally damaged 14 a building with intent to defraud an insurer 14:43:38 15 of that building. Did you do what the 16 document contends? 17 A. On the advice of counsel, I elect to assert 18 my Fifth Amendment privilege. 19 Q. The state contends that you recklessly 14:43:52 20 endangered the safety of Aaron Bolt. Did you 21 do what the state contends? 22 A. On the advice of counsel, I elect to assert 23 my Fifth Amendment privilege. 24 Q. The state contends that you recklessly 14:44:05 25 endangered the safety of Tim DiBona, D-I-</p>	<p style="text-align: center;">155</p> <p>1 Q. The state contends that you recklessly 2 endangered the safety of Austin VanSomeren? 3 V-A-N-S-O-M-E-R-E-N. Did you do what the 4 state contents? 14:45:28 5 A. On the advice of counsel, I elect to assert 6 my Fifth Amendment privilege. 7 Q. Did State Farm insure 105 River Street at the 8 time of fire? 9 A. On the advice of counsel, I elect to assert 14:45:37 10 my Fifth Amendment privilege. 11 Q. Did the fire occur on the early morning hours 12 of December 29, 2018? 13 A. On the advice of counsel, I elect to assert 14 my Fifth Amendment privilege. 14:45:46 15 Q. Was the building located at 105 River Street 16 completely destroyed by the fire? 17 A. On the advice of counsel, I elect to assert 18 my Fifth Amendment privilege. 19 Q. Did you set the fire? 14:46:03 20 A. On the advice of counsel, I elect to assert 21 my Fifth Amendment privilege. 22 Q. Did you hire anybody to set the fire? 23 A. On the advice of counsel, I elect to assert 24 my Fifth Amendment privilege. 14:46:12 25 Q. Did you ask anybody to set the fire?</p>
<p style="text-align: center;">154</p> <p>1 capital B-O-N-A. Did you do what the state 2 contends? 3 A. On the advice of counsel, I elect to assert 4 my Fifth Amendment privilege. 14:44:17 5 Q. The state contends that the recklessly 6 endangered the safety of Shawn Kline. Did 7 you do what the state contends? 8 A. On the advice of counsel, I elect to assert 9 my Fifth Amendment privilege. 14:44:30 10 Q. The state contends that you recklessly 11 endangered the safety of Matt Knegendorf, 12 K-N-E-G-E-N-D-O-R-F. Did you do what the 13 state contends? 14 A. On the advice of counsel, I elect to assert 14:44:47 15 my Fifth Amendment privilege. 16 Q. The state contends that you recklessly 17 endangered the safety Mitchell Knegendorf. 18 Did you do what the state contends? 19 A. On the advice of counsel, I elect to assert 14:44:58 20 my Fifth Amendment privilege. 21 Q. The state contends that you recklessly 22 endangered the safety of Chad Shafer. Did 23 you do what the state contends? 24 A. On the advice of counsel, I elect to assert 14:45:11 25 my Fifth Amendment privilege.</p>	<p style="text-align: center;">156</p> <p>1 A. On the advice of counsel, I elect to assert 2 my Fifth Amendment privilege. 3 Q. Do you know who set the fire? 4 A. On the advice of counsel, I elect to assert 14:46:20 5 my Fifth Amendment privilege. 6 Q. Did you have any hand in having the fire set? 7 A. On the advice of counsel, I elect to assert 8 my Fifth Amendment privilege. 9 Q. Did you have any hand in setting the fire? 14:46:31 10 A. On the advice of counsel, I elect to assert 11 my Fifth Amendment privilege. 12 MS. WEBER: Let's take a 13 couple-minute break. I'm just going to 14 review my notes. 14:46:50 15 (At this time a recess was taken.) 16 BY MS. WEBER: 17 Q. Mr. Grant, did State Farm pay all sums due to 18 you under the contract? 19 A. On the advice of counsel, I elect to assert 14:52:26 20 my Fifth Amendment privilege. 21 Q. Did State Farm fairly and reasonably adjust 22 your fire loss claim? 23 A. On the advice of counsel, I elect to assert 24 my Fifth Amendment privilege. 14:52:34 25 Q. Those are all of the questions that I have.</p>

<p style="text-align: right;">157</p> <p>1 MR. ANDERSON: See if I have</p> <p>2 anything just for clarification purposes.</p> <p>3 EXAMINATION</p> <p>4 BY MR. ANDERSON:</p> <p>14:53:02 5 Q. For clarification purposes, Mr. Grant, do you</p> <p>6 recall being asked some questions about a</p> <p>7 lawsuit involving American Express National</p> <p>8 Bank earlier today?</p> <p>9 A. Yes, I do.</p> <p>14:53:11 10 Q. There was some discussion about fraudulent</p> <p>11 charges, correct?</p> <p>12 A. Yes.</p> <p>13 Q. To be specific, that was not American Express</p> <p>14 National Bank alleging that you made</p> <p>14:53:23 15 fraudulent charges, correct?</p> <p>16 A. That's correct.</p> <p>17 Q. This was you alleging that there were</p> <p>18 fraudulent charges made on your account?</p> <p>19 A. Yes.</p> <p>14:53:41 20 Q. Do you recall being asked some questions</p> <p>21 about another matter of litigation, whether</p> <p>22 it's criminal or civil, about a failure to</p> <p>23 check traps?</p> <p>24 A. Yes.</p> <p>14:53:52 25 Q. Okay. There was never any finding of fact</p>	<p style="text-align: right;">159</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Mr. Grant, have you ever received a</p> <p>3 declination letter from State Farm?</p> <p>4 A. No.</p> <p>14:55:59 5 Q. Mr. Grant, have you ever received any</p> <p>6 information from State Farm as to if claims</p> <p>7 were not paid out why they were not paid out?</p> <p>8 A. No.</p> <p>9 Q. I don't think I have anything else.</p> <p>14:56:33 10 MS. WEBER: I have a couple follow</p> <p>11 up.</p> <p>12 MR. ANDERSON: Sure.</p> <p>13 FURTHER EXAMINATION</p> <p>14 BY MS. WEBER:</p> <p>14:56:39 15 Q. Mr. Grant, did State Farm deny your claim</p> <p>16 related to the fire loss?</p> <p>17 A. On the advice of counsel, I elect to assert</p> <p>18 my Fifth Amendment privilege.</p> <p>19 Q. Has any part of your claim related to the</p> <p>14:56:50 20 fire loss gone unpaid?</p> <p>21 A. On the advice of counsel, I elect to assert</p> <p>22 my Fifth Amendment privilege.</p> <p>23 Q. That's all I have.</p> <p>24 MR. ANDERSON: Thank you, counsel.</p> <p>14:57:00 25 MS. WEBER: Thank you guys for</p>
<p style="text-align: right;">158</p> <p>1 following a hearing with a trier of fact,</p> <p>2 whether it be a jury or a judge, determining</p> <p>3 that, in fact, you had failed to do so?</p> <p>4 A. No, there wasn't.</p> <p>14:54:07 5 Q. What happened is that you were not there and,</p> <p>6 not to put words in your mouth, but default</p> <p>7 judgment was granted against you?</p> <p>8 A. It was a default judgment.</p> <p>9 Q. Do you remember being asked some questions</p> <p>14:54:30 10 about Venture Properties?</p> <p>11 A. Yes.</p> <p>12 Q. Do you remember some testimony on your part</p> <p>13 that that entity was not registered with the</p> <p>14 state?</p> <p>14:54:41 15 A. Yes.</p> <p>16 Q. But, in fact, you had organized it as a</p> <p>17 partnership, although that partnership was</p> <p>18 not registered with the state, correct?</p> <p>19 A. Yes.</p> <p>14:54:50 20 Q. Do you remember being asked some questions</p> <p>21 about a refrigerator causing some damage</p> <p>22 earlier today?</p> <p>23 A. Yes.</p> <p>24 Q. Was that processed -- as to that damage, was</p> <p>14:55:25 25 that processed through an insurance claim?</p>	<p style="text-align: right;">160</p> <p>1 driving. Read and sign?</p> <p>2 MR. ANDERSON: As far as the</p> <p>3 transcript, I guess I have to see if it is an</p> <p>4 accurate representation, so I don't know if I</p> <p>5 can sign it just now.</p> <p>6 MS. WEBER: I'm asking if you want</p> <p>7 to read and sign of if you want to waive it.</p> <p>8 MR. ANDERSON: Yes.</p> <p>9 (The deposition concluded at</p> <p>10 approximately 5:00 p.m.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

1 C E R T I F I C A T E

2 I, Sandra K. Fellows, hereby
 3 certify that I am qualified as a verbatim
 4 shorthand reporter, that I took in
 5 stenographic shorthand the foregoing
 6 deposition of KEVIN GRANT, at the time and
 7 place aforesaid, and that the foregoing
 8 transcript consisting of 162 pages is a true
 9 and correct, full and complete transcription
 10 of said shorthand notes, to the best of my
 11 ability.

12 Dated at Roseville, Minnesota,
 13 this 18th day of October, 2021.

1 S I G N A T U R E P A G E

2 I, KEVIN GRANT, the deponent, hereby
 3 certify that I have read the foregoing
 4 transcript and made the following changes:
 5 PAGE: LINE: CHANGE:

6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17 -----
 18 KEVIN GRANT

19 Witness my hand and seal this _____
 20 day of _____, ____.

21 -----
 22 Notary Public

23 My Commission expires:

24 (SKF)

25 AFFILIATED COURT REPORTERS
 (651) 338-4348

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